

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

DIGI PORTAL LLC,

Plaintiff,

v.

TRULIA, LLC,

Defendant.

C.A. NO. _____

JURY TRIAL DEMANDED

PATENT CASE

ORIGINAL COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff Digi Portal LLC files this Original Complaint for Patent Infringement against Trulia LLC, and would respectfully show the Court as follows:

I. THE PARTIES

1. Plaintiff Digi Portal LLC (“Digi Portal” or “Plaintiff”) is a Texas limited liability company with its principal place of business at 101 E. Park Blvd, Suite 600, Plano, Texas 75074.

2. On information and belief, Defendant Trulia LLC (“Defendant”) is a limited liability company organized and existing under the laws of Delaware, with a place of business at 535 Mission St. Suite 700, San Francisco, CA 94105. Defendant has a registered agent at The Corporation Trust Company, Corporation Trust Center, 1209 Orange St., Wilmington, DE 19801.

II. JURISDICTION AND VENUE

3. This action arises under the patent laws of the United States, Title 35 of the United States Code. This Court has subject matter jurisdiction of such action under 28 U.S.C. §§ 1331 and 1338(a).

4. On information and belief, Defendant is subject to this Court’s specific and general personal jurisdiction, pursuant to due process and the Delaware Long-Arm Statute, due

at least to its business in this forum, including at least a portion of the infringements alleged herein. Furthermore, Defendant is subject to this Court's specific and general personal jurisdiction because Defendant is a Delaware limited liability company.

5. Without limitation, on information and belief, within this state, Defendant has used the patented inventions thereby committing, and continuing to commit, acts of patent infringement alleged herein. In addition, on information and belief, Defendant has derived revenues from its infringing acts occurring within Delaware. Further, on information and belief, Defendant is subject to the Court's general jurisdiction, including from regularly doing or soliciting business, engaging in other persistent courses of conduct, and deriving substantial revenue from goods and services provided to persons or entities in Delaware. Further, on information and belief, Defendant is subject to the Court's personal jurisdiction at least due to its sale of products and/or services within Delaware. Defendant has committed such purposeful acts and/or transactions in Delaware such that it reasonably should know and expect that it could be haled into this Court as a consequence of such activity.

6. Venue is proper in this district under 28 U.S.C. § 1400(b). On information and belief, Defendant was formed in Delaware. On information and belief, from and within this District Defendant has committed at least a portion of the infringements at issue in this case.

7. For these reasons, personal jurisdiction exists and venue is proper in this Court under 28 U.S.C. § 1400(b).

III. COUNT I
(PATENT INFRINGEMENT OF UNITED STATES PATENT NO. 8,352,854)

8. Plaintiff incorporates the above paragraphs herein by reference.

9. On January 8, 2013, United States Patent No. 8,352,854 ("the '854 Patent") was duly and legally issued by the United States Patent and Trademark Office. The '854 Patent is

titled “Dynamic Page Generator.” The ‘854 patent is not subject to a terminal disclaimer and its term is extended under 35 U.S.C. 154(b) by 1270 days. (Ex. A). A true and correct copy of the ‘854 Patent is attached hereto as Exhibit A and incorporated herein by reference.

10. Digi Portal is the assignee of all right, title and interest in the ‘854 patent, including all rights to enforce and prosecute actions for infringement and to collect damages for all relevant times against infringers of the ‘854 Patent. Accordingly, Digi Portal possesses the exclusive right and standing to prosecute the present action for infringement of the ‘854 Patent by Defendant.

11. The application leading to the ‘854 patent is a continuation of U.S. application Ser. No. 11/656,636, filed Jan. 22, 2007, which is a continuation of U.S. application Ser. No. 09/393,718, filed Sep. 10, 1999, which is a continuation of U.S. application Ser. No. 08/873,975, filed Jun. 12, 1997. (Ex. A at cover). The ‘854 patent was first assigned to Yahoo! Inc. (*Id.*).

12. The invention in the ‘854 Patent relates to the field of customized information presentation on the web; more specifically, providing customized pages that are quickly served and scalable to handle many users simultaneously. (*Id.* at col. 1:26-30).

13. Web servers for serving static web pages were well known in the global Internet. (*Id.* at col. 1:31-32). Such static web pages are useful in many applications whether the information presented to each requesting user is the same. (*Id.* at col. 1:32-34). However, some applications require customization to appeal to users. (*Id.* at col. 1:34-35). One example is presenting news to users. (*Id.* at col. 1:35-37). When static pages are used, a user will often have to scroll through many topics not of interest to that user to get to the information of interest. (*Id.* at col. 1:37-40). However, when presenting news to users, customized web pages present

news that is more relevant to the requesting user than static pages because the information is filtered according to each user's interest. (*Id.* at col. 1:35-37, 40-41).

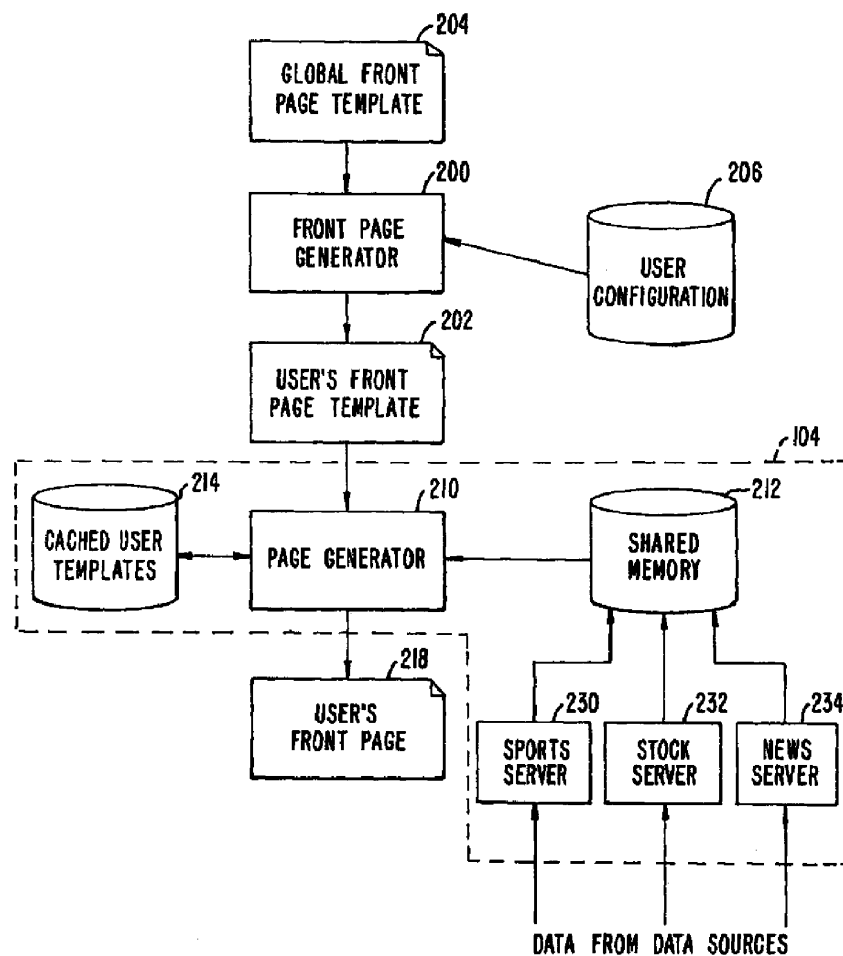
14. Customizing a server response based on the requester is known; however, known systems do not scale well. (*Id.* at col. 1:42-43). One method of serving custom pages is to execute a script, such as a Common Gateway Interface (CGI) script or other program to collect the information necessary to generate the custom page. (*Id.* at col. 1:43-47). For example, if the custom page is a news page containing stock quotes, sports scores and weather, the script might poll a quote server to obtain the quotes of interest, poll a sports score server to obtain the scores of interest and poll a weather server to obtain the weather. (*Id.* at col. 1:47-51). With this information, the server generates the custom page and returns it to the user. (*Id.* at col. 1:51-52). This approach is only useful where there are not many requesters and where the attendant delay associated with polling various servers to obtain the requested information is acceptable to users. (*Id.* at col. 1:53-54). Growing impatience with waiting will turn users away from such servers, especially as use increases. (*Id.* at col. 1:54-58).

15. One approach that was used in the prior art to avoid long waits is to transfer the custom information in non-real-time, so that the information is stored local to the user as it arrives and is presented to the user on request. (*Id.* at col. 1:59-62). A disadvantage of such a system is that the networks used by the user become clogged with data continually streaming to the user and require large amounts of local storage. (*Id.* at col. 1:62-65). Another disadvantage is that the locally stored information will become out of date as the server receives new data. (*Id.* at col. 1:65-67).

16. The inventors therefore recognized that there was a need to dynamically generate customized pages in an unconventional manner that solved the technical problems in the prior art

of long transfer times to obtain the requested information or having to rely on continually transferring custom information in non-real time which can clog the data network in addition to providing outdated information. (*Id.* at col. 1:42 to col. 2:2).

17. The following is a discussion of non-limiting examples of the claimed invention discussed in the specification of the '854 patent. The '854 patent provides a non-limiting exemplary diagram of the generation of a custom page for a user, using a front-page generator (200) and page server (104) (*Id.* at col. 3:58-60):



(Ex. A at Fig. 2). Front page generator (200) generates a user template (202) from a global front page template (204) and a user configuration record (206). (*Id.* at col. 3:58-62). A non-limiting example of a global front page template is provided in the '854 patent:

```

<html>
<head>
<title>My Yahoo! news summary for <!-- login --></title>
</head>
<body>

<center>
<!--banner:sum -->

<!-- ad -->
<!-- nav bar --> ~ 302
</center>

<table border=1 cellpadding=4 cellspacing=0 width=100%>
<tr><td align=center valign=top width="1%">
<!-- leftside:nsum --> ~ 302
<p></td>
<td align=center valign=top width="100%">
<!-- mode bar:"FRONT PAGE" -->
<!-- channel:nsum --> ~ 302

</td></tr>
</table>

<center>
<table border=1 cellpadding=2 cellspacing=0 width=100%>
<!-- motd:motn.html -->
</table>
</center>
<!-- search -->

<!-- copyright:sum -->

</body>
</html>

```

204

(Ex. A at Fig. 3). The global user template (204) is an HTML (HyperText Markup Language) document with additional tags as placeholders for live data. (*Id.* at col. 5:16-19). Several placeholders (302) are shown in the code. (*Id.* at col. 5:19).

18. A user configuration record (206) is a record selected from user configuration database (116). (*Id.* at col. 3:63-64). User configuration information includes user demographic information, such as sex, age, location, stock quotes, favorite sports teams, news topics, etc. (*Id.* at col. 2:13-14, col. 5:45-50, col. 6:37-39, 46-48, 52-56). The user configuration information in the example may not change until the user changes his or her preferences. (*Id.* at col. 5:33-35).

19. The '854 patent provides an illustration of a user template (202) as might be generated from global user template (204) and a user configuration record (206):

202

```

    <!-- timezone:-8,PT 0 -->
    <!-- ad:M,85,95035,T,* 792 -->
    <!-- portfolio:Quotes,pf_1,1,^DJI,^NYA,^IXIC,^SPX,^XAX,YHOO,NSCP,IOM,NSCP,YHOO
404 { 2836 -->
    <!--
scoreboard:NCAAFSSC,NHLSAN,MLSSAN,NCAAFSSS,ALOAK,NBAGSW,NFLOAK,NCAAFCCD,NFLSFO
,NLSFO 3803 -->
    <!-- weather:f,30901,uk_londo,94601,95101 4368 -->
    <!--
mode_bar:"FRONT_PAGE",.hier=News+Summary%3aEdit&.done=http://my.yahoo.com/news
/summary2:3,rt,rw,z0000,mlb,re,vf 4597 -->
    <!-- motd:us_motn.html 4696 -->
    <html>
    <head>
    <title>My Yahoo! news summary for ash802</title>
    </head>
    <body>

    ...

    </body>
    </html>

```

(Ex. A at Fig. 4). The user template is unique because it is built based on user demographic information provided by the user, as opposed to generically chosen dynamic information or based on information provided by the server. Exemplary demographic information is shown in line 2 of Fig. 4 (“:M,85,95035,T,*”) indicating that the user is a male, age 85, located in zip code 95035, etc. (*Id.* at col. 5:42-45). The ‘854 patent includes a full listing of the non-limiting exemplary user template of Fig. 4 in Appendix A. (Ex. A at col. 2:57-58; col. 5:22-23).

Listing of a User Template

```

<!-- timezone: -8,PT 0 -->
<!-- ad:M,85,95035,T,* 792 -->
<!--
portfolio:Quotes,pf_1,1,`DJL`,`NYA`,`IXIC`,`SPX`,`XAX,YHOO,NSCP,IOM,NSCP,YHOO
2836 -->
<!--
scoreboard:NCAAFSSC,NHLSAN,MLSSAN,NCAAFSSS,ALOAK,NBAGSW,NFLOAK,NCAAFCCD,NF
LSFO,NLSFO 3803 -->
<!-- weather:f,30901,uk_londo,94601,95101 4368 - - >
<!--
mode_bar:"FRONT_PAGE1",hier=News+Summary%3aEdit&.done=http://my.yahoo.com/
news/summary.html?v 4538 -->
<!-- summary2:3,rt,rw,z0000,mlb,re,vf 4597 -->
<!-- motd:us__motn.html 4696 -->
<html>
<head>
<title>My Yahoo!news summary for ash802</title>
</head>
<body>

<center>
<map name="top"><area shape=rect coords="0,0,45,66"
href="/news/summary.html?v"><area shape=rect coords="45,0,90,66"
href="/internet/directory.html?v"><area shape=rect coords="90,0,135,66"
href="/contacts/white_pages.html?v"><area shape=rect coords="135,0,346,66"
href="/myHome"><area shape=rect coords="346,0,389,66"
href="/help/news/summary.html"><area shape=rect coords="389,0,431,66"
href="http://edit.my.yahoo.com/config/eval_profile"><area shape=rect
coords="431,0,477,66" href="http://edit.my.yahoo.com/config/tofill">
</map>
<center><a href="/bin/top_menu"></a></center>

<p>
<center><form action="http://search.my.yahoo.com/search/my"> <font
size="-2">[ <a
href="http://edit.my.yahoo.com/config/set_attr?attr=sloc&value=b&.done=htt
p://my.yahoo.com/news/summary.html?v">move to bottom</a> ] </font><input
size=25 name=p> <font size="-1">&nbsp;<input type=submit
value=Search><input type=hidden name=n value="25"> &nbsp;<a
href="http://search.my.yahoo.com/search/my/options">Options</a></font> </fo
rm></center><p>
<center>
<table border=0 cellpadding=0 cellspacing=2>
<tr>
<td align=center><font
color="#000000"><b>Sections:</b>&nbsp;<b>&nbsp;</b></font></td>
<td align=center bgcolor="#dcdcdc"><font
color="#000000"><b>Front&nbsp;<b>Page</b></font></td>
<td>&nbsp;<b>&nbsp;</td>
<td align=center><a href="/news/business/summary.html?v">Business</a></td>
<td>&nbsp;<b>&nbsp;</td>
<td align=center><a
href="/news/portfolio_summary.html?v">Portfolios</a></td>
<td>&nbsp;<b>&nbsp;</td>
<td align=center><a
href="/news/entertainment/summary.html?v">Entertainment</a></td>
<td>&nbsp;<b>&nbsp;</td>
<td align=center><a href="/news/sports/summary.html?v">Sports</a></td>
<td>&nbsp;<b>&nbsp;</td>
<td align=center><a
href="/news/technology/summary.html?v">Technology</a></td>
</tr>
</table>
</center>
</center>
<table border=1 cellpadding=4 cellspacing=0 width="100%">
<tr><td align=center valign=top width="1%">
<a
href="http://edit.my.yahoo.com/config/eval_left?mode=left_nsum&.done=http%
3a%2f%2fmy%2eyahoo%2ecom%2fnews%2fsummary%2html%3fv"></a>
<table border=0 cellpadding=1 cellspacing=0 width="100%">
<tr bgcolor="#dcdcdc"><td colspan=4 width="100%"><table border=0
cellpadding=2 cellspacing=0 width="100%"><tr><td width="100%"><b><font
size="+1">P<font size="+0">ORITFOLIOS</font></font></b></td><td>

```

```
<align=right><a  
href="http://edit.my.yahoo.com/config/eval_quotes?.done=http://my.yahoo.co  
m/news/summary.html?v"></a></td></tr></table></td></tr>  
<tr><td align=center colspan=4><form method=get  
action="http://quote.yahoo.com/quotes"><font size="-1"><input type=text  
size=10 name=symbols><input type=submit value="Get Quotes"><br><font  
size="0">quotes delayed 20 minutes - <a  
href="/fin_disclaimer.html">disclaimer</a><br>click on symbol for detailed  
quote + news<br><b>*</b> indicates new news during last  
24hrs <font></form></td></tr></table>  
  
<tr size=0><table border=0 cellpadding=1 cellspacing=0 width="100%">  
<tr bgcolor="#dcdcdc"><td colspan=5 width="100%"><table border=0  
cellpadding=2 cellspacing=0 width="100%"><tr><td width="100%"><a  
href="/sum/?http://sports.yahoo.com/"><b><font size="+1">S<font  
size="+0">COREBOARD</font></font></b></a></td><td align=right><a  
href="http://edit.my.yaho9.com/config/set_sports?.done=http://my.yahoo.com  
/news/summary.html?y"></a></td></tr></table></td></tr>  
  
<tr size=0><table border=0 cellpadding=2 cellspacing=0 width="100%">  
<tr bgcolor="#dcdcdc"><td colspan=3 width="100%"><table border=0  
cellpadding=2 cellspacing=0 width="100%"><tr><td width="100%"><a  
href="/my/?http://weather.yahoo.com/"><b><font size="+1">W<font  
size="+0">EATHER</font></font></b></a></td><td align=right><a  
href="http://edit.my.yahoo.com/config/set_vni?.done=http://my.yahoo.com/ne  
ws/summary.html?v"></a></td></tr></table></td></tr>  
<tr><td align=center colspan=3><font size=0>click on city for extended  
forecast</font></td></tr>  
</table>  
  
<tr size=0>  
<p></td>  
<td align=center valign=top width="100%">  
  
<table border=1 cellpadding=2 cellspacing=0 width="100%">  
</table>  
  
</td></tr>  
</table>  
  
<center>  
<table border=1 cellpadding=2 cellspacing=0 width="100%">  
  
</table>  
</center>  
  
<p>  
<hr>  
<center>  
<table border=0 cellpadding=0 cellspacing=0 width="100%">  
<tr>  
<td align=left valign=top><table border=0 cellpadding=0 cellspacing=0>  
<tr><td align=left valign=bottom><a href="/my/?http://www.yahoo.com/"></a></td>  
<td>&nbsp; ; &nbsp; ; </td>  
<td align=left valign=bottom width="100%"><font size="-1"><i>Copyright  
&copy; 1994-1997 Yahoo! Inc. All rights reserved.</i><br>Portions  
copyright &copy; 1997 Reuters Ltd. All rights reserved.<br>Portions copyright &copy; 1997 SportsTicker Enterprises LP. All rights  
reserved.<br>Portions copyright &copy; 1997 Weathernews Inc. All rights reserved.<br>Portions copyright &copy; 1997 Business Wire. All rights reserved.<br>Portions copyright &copy; 1997 PR Newswire. All rights reserved.<br>Questions, comments, or suggestions? Send us <a  
href="http://my.yahoo.com/feedback.html">feedback</a>. </font></td>  
</tr>  
</table>  
</tp>  
<td>&nbsp; ; &nbsp; ; </td>  
<td align=right><a href="/bin/logout_menu"></a></td>
</tr>
</table>
</center>
<map name=logout>
<area coords="0,0,50,68" href="/my/?http://www.yahoo.com/">
<area coords="51,0,100,68"
href="http://edit.my.yahoo.com/config/login?logout=1">
</map>

</body>
</html>

```

(Ex. B at Col. 7-11).

20. As shown in Fig. 2 of the '854 patent, the user template does not need to be generated each time and instead can be generated and stored. (Ex. A at col. 4:49-51, col. 5:23-32). One benefit of the claimed invention that speeds up the operation of the dynamic page generation is that the page can be stored in multiple locations that are based on the frequency by which the user requests the customized page based on the user template. (*Id.* at col. 5:37-38, col. 6:49-59). Some users might choose to access their user page infrequently, while others might choose to access their front page hourly. (*Id.* at col. 6: 52-54). For infrequent users, the user template is stored in a user configuration database, whereas for frequent users the user template may also be stored in cache. (*Id.* at col. 5:37-38, col. 6:51-59). Caching reduces the time to respond to a request for a page and is more effective where the typical user makes several requests in a short time span and then doesn't make any requests for a long period of time. (*Id.* at col. 5:29-32).

21. When the user template stored in cache, it may be stored long enough to be reused and may also be flushed from cache if the user page has been inactive for several days. (*Id.* at col. 6:49-52, 59-60). Even if it is flushed from cache, the user template can be maintained in the user configuration database, which can then be quickly accessed and stored in cache in the event a user may start to access the user page quickly. (*Id.*).

22. The custom user page can also include an advertisement that is selected based on the user demographic information. (*Id.* at col. 5:39-42). For example, using the demographic information “:M,85,95035,T,*”, an advertisement can be selected that is targeted for a male user, age 85, located in zip code 95035, etc. (*Id.* at col. 5:39-45).

23. Appendix B of the ‘854 patent is an HTML source code listing of an HTML page created from an executed user template that is used to generate a user customized browser web page. (Ex. B at col. 11 – col. 19).

24. As explained the ‘854 patent and prosecution history, there are unconventional and non-generic features of the claimed invention which are technical improvements that make the generation of dynamic web pages quicker, more efficient, and use less resources. By storing the user customized template program in two locations in which the location is determined by frequency, the system is more efficient and allows for a quicker response than the prior art. For example, by storing the user customized template in user configuration database and in cache, the dynamic generation of a user customized web page is more efficient and uses less resources of the server, database, and network, and allows for a quicker generation of the dynamic web page thereby allowing the server to scale in order to handle substantially more requests for user customized dynamic web pages. (*See* Ex. A at col. 1:42-67, col. 4:49-col. 5:15, col. 5:23-32). Furthermore, by caching the user template, the page can be generated entirely within a page server, thus conserving network and database resources. (*See id.* at col. 4:10-11, col. 5:23-32). By also storing the user customized template in a user configuration database, even if the cache is cleared, the template already exists in the database which then prevents having to regenerate a new user customized page from a global page template using a user configuration record thus saving database and server resources and more quickly generating the requested web page from

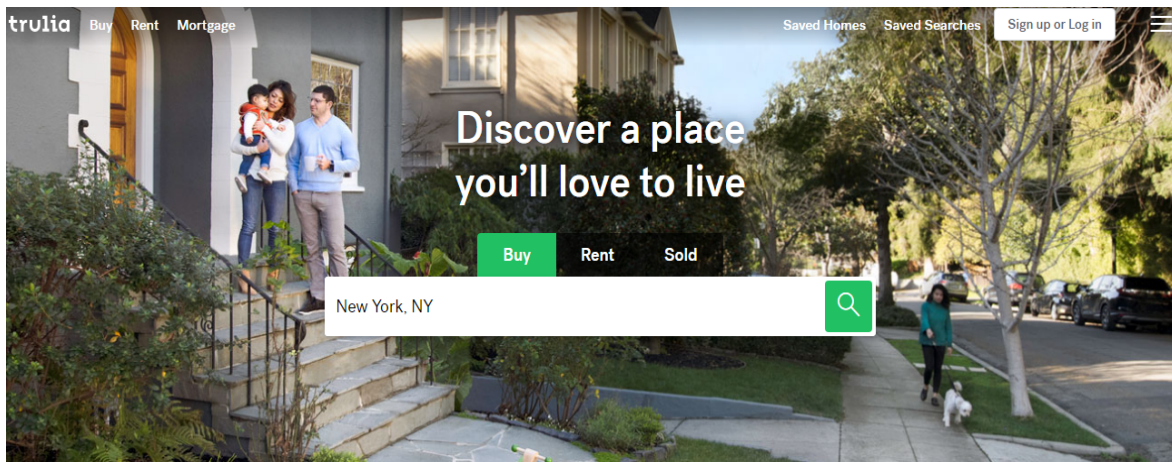
the user customized template. (*E.g.*, *id.* at col. 3:37-39, col. 4:1-11, 49-62). The storage of a user customized template program in at least two locations and the location determined from the frequency of the user request for the customized page was an unconventional and non-generic method for storing such templates and was not disclosed in the prior art. (Ex. C (Oct. 28, 2010 Resp. to Office Action) at 9).

25. Furthermore, the invention provides for more personalized web pages because the user provides user configuration information on which the user customized template is generated. (Ex. C (Oct. 28, 2010 Resp. to Office Action) at 9; Ex. D (Apr. 18, 2011 Resp. to Office Action) at 6). This was an unconventional way for generating a user customized template unique to the user that was not found in the prior art. (Ex. D (Apr. 18, 2011 Resp. to Office Action) at 6).

26. The patents related to the ‘854 patent and sharing the same specification were cited during the prosecution history of over 700 patents, including patents and applications owned by companies including Google, Inc., Microsoft Corporation, Amazon Technologies, Inc., Facebook, Inc., Ebay, Inc., Salesforce.com, Inc., IBM Corporation, Oracle International Corporation, Comcast Cable Communications, LLC, SAP AG, Citrix Systems, Inc., BEA Systems, Inc., Sprint Communications Company L.P., Siemens AG, AT&T Intellectual Property I, L.P., Hewlett-Packard Development Company, L.P., Fujitsu Limited, AOL LLC, General Electric Company, Accenture LLP, Adobe Systems Inc., Sony Computer Entertainment Inc., and Akamai Technologies, Inc. (See <http://patft.uspto.gov/netacgi/nph-Parser?Sect1=PTO2&Sect2=HITOFF&p=1&u=%2Fnetacgi%2Fsearch-bool.html&r=0&f=S&l=50&TERM1=5983227&FIELD1=UREF&co1=AND&TERM2=&FIELD2=&d=PTXT>).

27. **Direct Infringement.** Upon information and belief, Defendant has been directly infringing at least claims 1-3, 8-10, and 15 of the '854 patent in Delaware, and elsewhere in the United States, by performing the claimed method, using the claimed computer-readable non-transitory medium storing computer instructions, and/or making and/or using the claimed system at Trulia.com (“Accused Instrumentality”).

28. The Accused Instrumentality performs the step of receiving a user request for a customized page. For example, Trulia.com receives a user request for a user customized page:



(E.g., <https://www.trulia.com/>).

×

Sign in or register

to save your favorite homes

Enter email address

Submit

OR

f

Continue with Facebook

G

Continue with Google

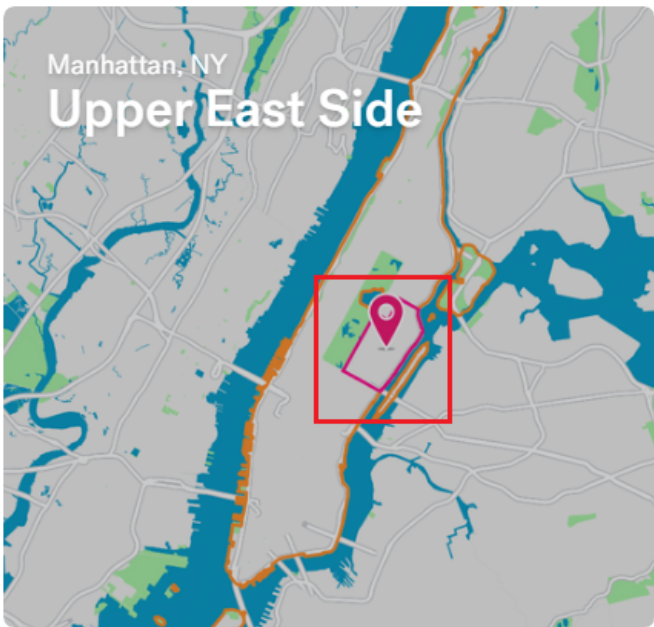
I accept Trulia's Terms of Use and Privacy Policy.

Are you a Real Estate Professional? Register here.

(E.g., <https://www.trulia.com/>).

Manhattan, NY

Upper East Side



Neighborhood Overview

Buy:

\$275K - \$88M

Rent:

\$1.7K - \$125K

To Downtown New York:

22 minutes

For Sale on Trulia:

1495 homes →

For Rent on Trulia:

1049 homes →

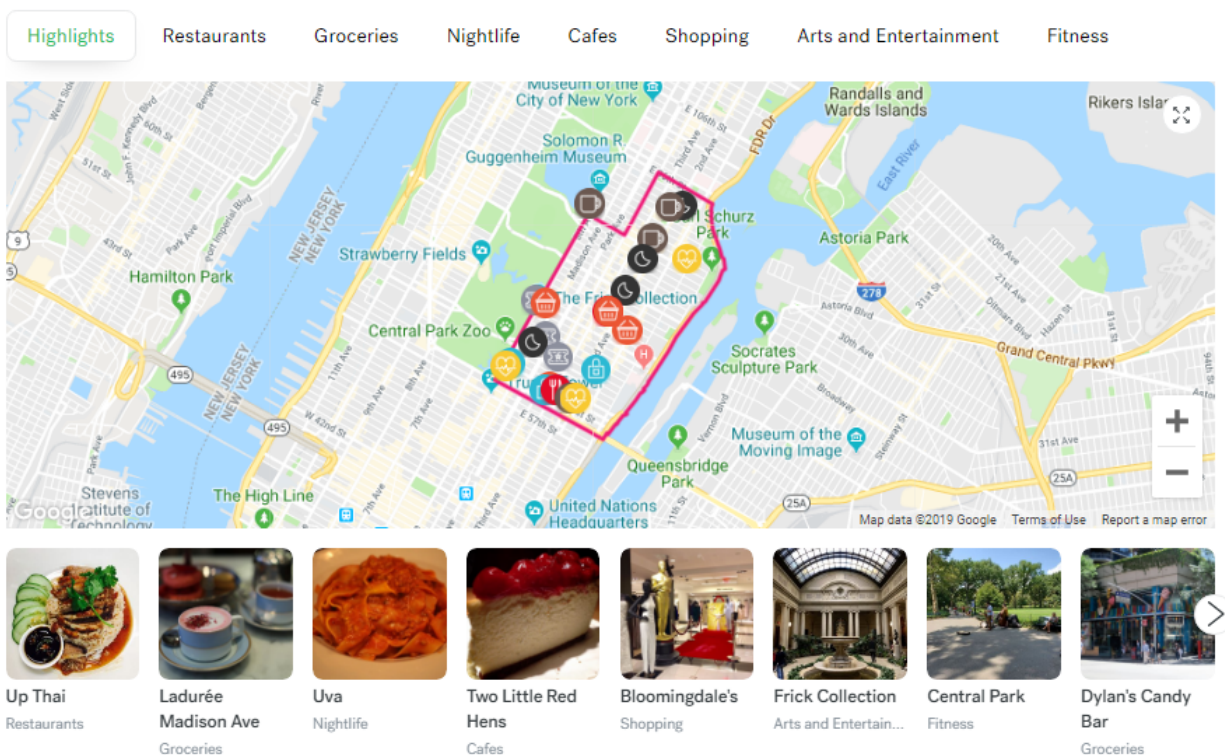
54 Schools:

Rated 2/10 - 10/10

(<https://www.trulia.com/n/ny/new-york/upper-east-side/85381/> (for a particular user)).

29. The Accused Instrumentality performs the step of receiving a template program (e.g., software instructions and data used for rendering a particular user’s Trulia.com page such

as a JavaScript page) that is unique to the user and based on user configuration information (*e.g.*, JavaScript pages will be specific to a user because the content can be modified by and/or customized for a user). The user configuration information is supplied by the user (*e.g.*, a user defines the information the user's template will display by inputting information such as the user's location; a user can customize the content of their templates and what will be rendered and displayed using the templates by entering information such as the user's location) and used to build the template program that is unique to the user (*e.g.*, user profile and user configuration information is used to modify templates, create instructions, and designate appropriate data retrieval for rendering the user's specific page). The following screenshots demonstrate the result of the Accused Instrumentality satisfying these limitations:

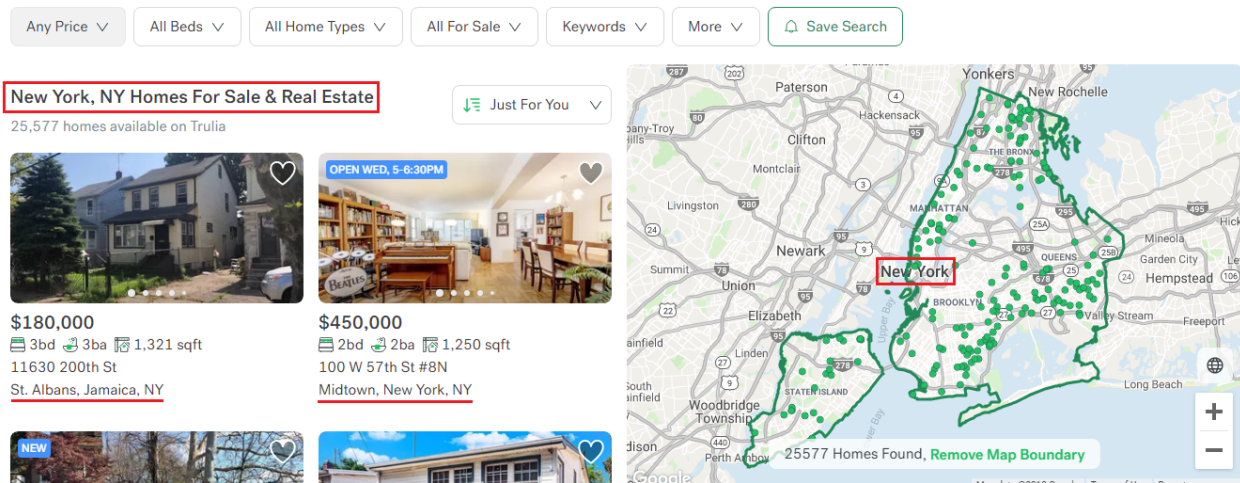


(*E.g.*, <https://www.trulia.com/n/ny/new-york/upper-east-side/85381/> (for a particular user)).

30. For example, each user's respective pages demonstrates that the template program is varied so that each user can receive appropriately customized pages (*e.g.*, the code for each

respective page is updated/adapted to pull from different resources so that the appropriate information/data can be referenced/displayed for each user). The screenshots below show two different template programs belonging to two respective users based on user configuration information with the user configuration information (including user demographic information) being supplied by the user that is used to build the template program that is unique to the user:

First User



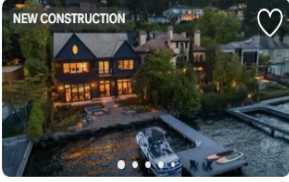
(https://www.trulia.com/NY/New_York/ (for a particular user)).

Second User

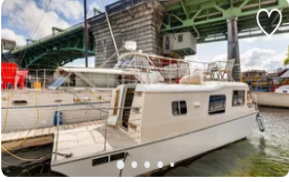
Any Price ▾ All Beds ▾ All Home Types ▾ All For Sale ▾ Keywords ▾ More ▾ [Save Search](#)

Seattle, WA Homes For Sale & Real Estate Just For You ▾


2,895 homes available on Trulia




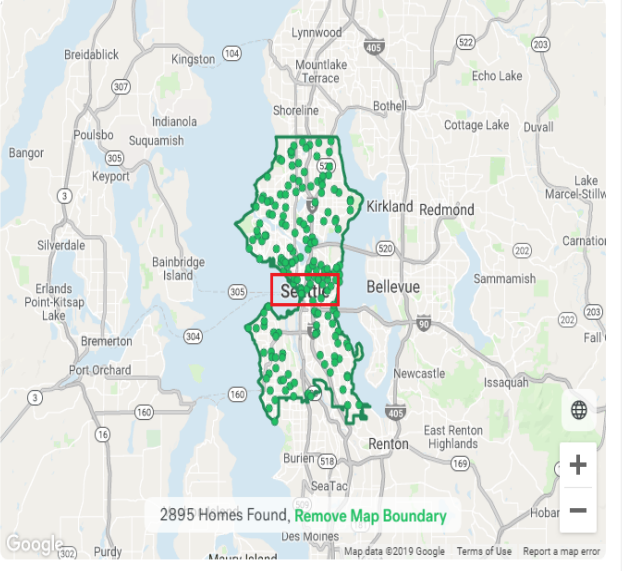
\$10,800,000
4bd 5ba 6,114 sqft
438 39th Ave E
Madison Park, Seattle, WA



\$125,000
1bd 1ba 142 sqft
3304 Fuhrman Ave E #6
Portage Bay, Seattle, WA







(<https://www.trulia.com/WA/Seattle/> (for a particular user)).

31. As another example, a user can customize their Trulia.com page by selecting their saved deals (Buy/Rent), so that selected deals (Buy/Rent) can be displayed. Below are screenshots pertaining to the selection process.


Saved Homes Saved Rentals

You haven't added any homes yet.
Start searching for properties to add now.

[Search Homes](#)

(<https://www.trulia.com/account/properties> (for a particular user)).


[Saved Homes](#)
[Saved Rentals](#)
[Display of Saved Searches](#)



\$400,000

3 bd - 1 ba - 1186 sqft - Condo
1065 Vermont St #8D
Brooklyn, NY, East New York


[View Details](#)



\$599,000

3 bd - 3 ba - 1442 sqft - Single-Family Home
18530 Ilion Ave
Jamaica, NY, Hollis

[View Details](#)



\$450,000


2 bd - 2 ba - 1250 sqft - Coop
100 W 57th St #8N
New York, NY, Midtown

[View Details](#)

(<https://www.trulia.com/account/properties> (for a particular user)). Shown below are screenshots of webpages customized according to the selected property related deals (Buy/Rent) of two respective users.


First User

[Any Price](#)
[All Beds](#)
[All Home Types](#)
[All For Sale](#)
[Keywords](#)
[More](#)
[Save Search](#)



\$180,000

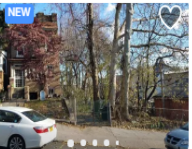
3bd 3ba 1,321 sqft
11630 200th St
St. Albans, Jamaica, NY



\$450,000


2bd 2ba 1,250 sqft
100 W 57th St #8N
Midtown, New York, NY

Selecting saved searches




\$295,000

4,645 sqft
21 Barbey St #1
East New York, Brooklyn, NY




\$199,999

3bd 1ba 800 sqft
12 Edgewater Park #12A
Throne Neck, Bronx, NY



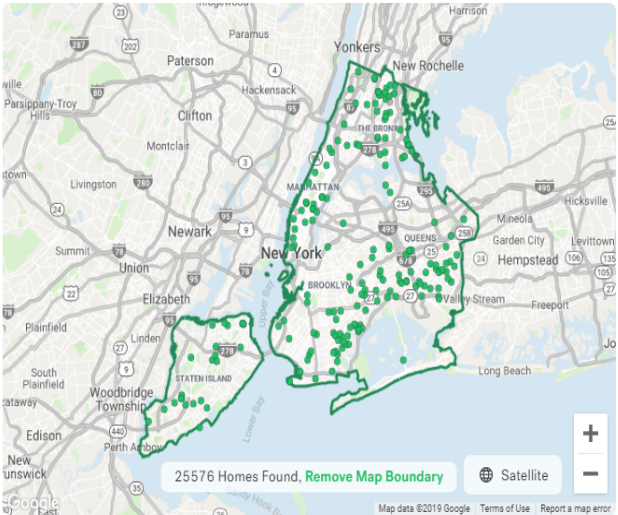
\$599,000

3bd 3ba 1,442 sqft
18530 Ilion Ave
Hollie, Jamaica, NY



\$400,000

3bd 1ba 1,186 sqft
1065 Vermont St #8D
East New York, Brooklyn, NY




25576 Homes Found. [Remove Map Boundary](#) [Satellite](#)

Map data ©2019 Google Terms of Use Report a map error

(https://www.trulia.com/NY/New_York/ (for a particular user)).

Display of Saved Searches


[Saved Homes](#)
[Saved Rentals](#)



\$400,000

3 bd - 1 ba - 1186 sqft - Condo
1065 Vermont St #8D
Brooklyn, NY, East New York


[View Details](#)



\$599,000

3 bd - 3 ba - 1442 sqft - Single-Family Home
18530 Ilion Ave
Jamaica, NY, Hollis

[View Details](#)



\$450,000

2 bd - 2 ba - 1250 sqft - Coop
100 W 57th St #8N
New York, NY, Midtown


[View Details](#)

OPEN Wed Aug 14 5pm to 6:30pm

(<https://www.trulia.com/account/properties> (for a particular user)).


Second User

[Any Price](#)
[All Beds](#)
[All Home Types](#)
[All For Sale](#)
[Keywords](#)
[More](#)
[Saved Search](#)




\$397,777

4bd 2ba 1,370 sqft
524 S Director St
South Park, Seattle, WA




\$719,500

3bd 3ba 2,040 sqft
4159 Cascadia Ave S
Mt. Baker, Seattle, WA



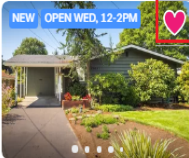
\$725,000

6bd 2ba 2,680 sqft
2807 NE 105th St
Meadowbrook, Seattle, WA




\$300,000

3bd 1ba 1,660 sqft
13636 4th Ave NE
Haller Lake, Seattle, WA



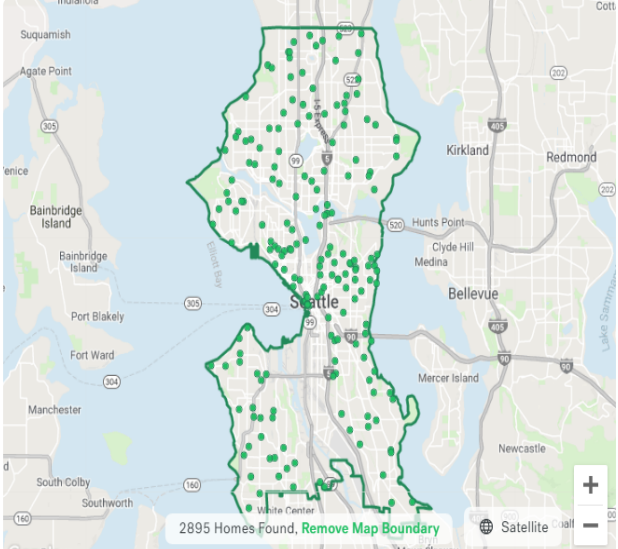
\$649,950

3bd 2ba 1,520 sqft
12041 10th Ave NW
Broadview, Seattle, WA



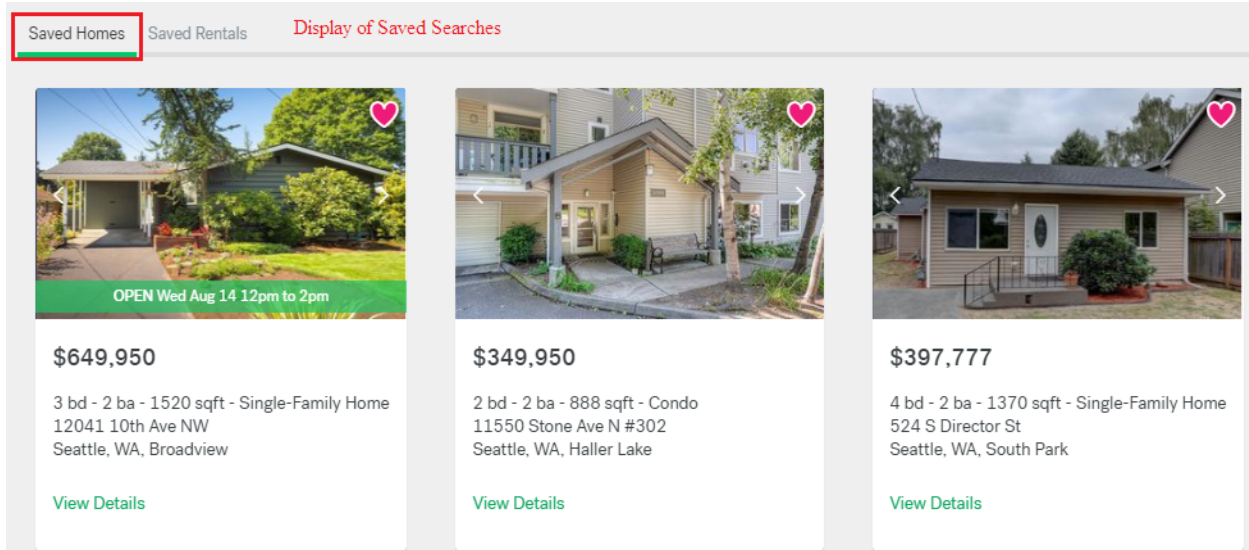
\$349,950

2bd 2ba 888 sqft
11550 Stone Ave N #302
Haller Lake, Seattle, WA



2895 Homes Found, [Remove Map Boundary](#)

(<https://www.trulia.com/WA/Seattle/> (for a particular user)).



(<https://www.trulia.com/account/properties> (for a particular user)). On information and belief, “Saved Listings (Buy/Rent)” data is stored locally in cookies. The JavaScript file, which has a utility function, is retrieved from the CDN and handles storing and retrieval of the saved property related deals (Buy/Rent), and user data stored and retrieved from local storage or cookie locations.

32. The user configuration information supplied by the user to build the template program includes user demographic information (*e.g.*, a user’s profile information and/or configuration information such as the user’s name, address, postal code and other information). (*E.g.*, <https://www.zillow.com/corp/Privacy.htm>).

33. The template program is received from one of at least two locations (*e.g.*, the data and templates comprising a user’s page may be retrieved from a main server/disk storage), the location determined from the frequency of the user request for the customized Trulia.com page (*e.g.*, based on the frequency at which a user logs in or accesses their Trulia.com page, the data comprising the users page may be stored at a main server). On information and belief, template information that is part of the template program is stored for less frequently accessed files in the

main storage and for more frequently accessed files in local storage on the user's computer. On information and belief, running the template program (page generation code, tiles, containers, and user data) creates the customized webpage. On information and belief, when a user signs-up or performs a login, the code takes the user template information and stores it in a site Javascript object that is used in logic to display various available properties and other site logic-based conditions. On information and belief, the user information is stored in multiple locations, which can include, (1) at runtime, in a Javascript object with the data structure called ContextData; (2) within browser local storage; and (3) browser cookies.

```
r.getNodeFromInstance(e:null),Mount:a,Reconciler:o));var h,m,_j,v,g,b,w,k,H;e.exports=p,function(e,t,n){function r(e,t){return
1===e.nodeType&&e.getAttribute(m)===String(t)||8===e.nodeType&&e.nodeValue===react-text:"+"+""}function i(e){for(var
t;e._renderedComponent;e=t)return e;function a(e,t){var n=i(e);n._hostNode=t[t.y]=n;function o(e){var t=e._hostNode;t&&(delete t[y],e._hostNode=null)}function s(e,t){if(!
(e._flags&&.hasCachedChildNodes)){var n=e._renderedChildren,o=t.firstChild;for(var s in n)if(n.hasOwnProperty(s)){var u=n[s],l=i(u),d=ID;if(0===l)
{for(;;null===o;o=o.nextSibling)if(r(o,1)){a(u,o);continue}e[d("32",1)]={e._flags=_.hasCachedChildNodes;function u(e){if(e[y])return e[y];for(var t=[];!e[y];)
{if(t.push(e),e._parentNode)return null;e._parentNode=_.parentNode;for(var n,r;e&&(r=e[y]);e=_reactInternalInstance$+Math.random().toString(36).slice(2),v=
t:null;function c(e){if(void 0===e._hostNode&&d("33"),e._hostNode)return e._hostNode;for(var t=
[];e._hostNode;e._hostNode=t.push(e),e._hostParent[d("34"),e._hostParent;for(;t.length;e=t.pop())s(e,e._hostNode);return e._hostNode}var
d=n(37),f=n(38),p=n(40),h=n(39),m=f.ID_ATTRIBUTE_NAME,_p,y="__reactInternalInstance$"+Math.random().toString(36).slice(2),v=
getClosestInstanceFromNode:u,getInstanceFromNode:l,getNodeFromInstance:c,precacheChildNodes:s,precacheNode:a,uncacheNode:o;e.exports=v},function(e,t){function n(e)
{for(var t=arguments.length-1,n="Minified React error #"++t; visit http://facebook.github.io/react/docs/error-decoder.html?
invariant="+e,r=0;r<t;r++)n+="&args["++r+encodeURIComponent(arguments[r+1])"]&#34; for the full message or use the non-minified dev environment for full errors and additional helpful
warnings.";var i=new Error(n);throw i.name="Invariant Violation",i.framesToPop=1,i}.exports=n},function(e,t,n){function r(e,t){return(e&t)===t;var i=n(37),a=n(39),o=
{HUSL_USE_PROPERTY:1,HAS_BOOLEAN_VALUE:4,HAS_NUMERIC_VALUE:8,HAS_POSITIVE_NUMERIC_VALUE:24,HAS_OVERLOADED_BOOLEAN_VALUE:32,injectDOMPropertyConfig:function(e){var t=o,n=e.Properties||
{}},a=e.DOMAttributeNamespaces||{}},s=e.DOMAttributeNames||{}},l=e.DOMPropertyNames||{}},c=e.DOMMutationMethods||
{}
```

(<https://static.trulia->

cdn.com/javascript/140a0b7/include/js/_built/combo/site_js_new.31d1be8686c06ab56722.js (for a particular user)).

```
{z:googleyolo,t.resolve(z)},_hintVoloPromise:function e(){var t=this;return z.hint({supportedAuthMethods:["https://accounts.google.com"],supportedIdTokenProviders:
[uri:"https://accounts.google.com",clientId:t.clientId]}),cancelSingleTapSignUp:function e()
{this._setLastSeenLocalStorageToken(),z.cancelLastOperation(),isGoogleOneTapEnabled:function e(){return this.isGoogleOneTapSignUpEnabled,login:function e(){var
t=s.Deferred(),n=this;return this._loadGoogleVoloClient().then(function(e){n._hintVoloPromise().then(function(e){e&&e.idToken&&.loginTruliaUser(e.idToken,t)},function(e)
{n._closeBanner(t)}),function(e){n._handleGoogleErrorTracking(t)},t.promise()),_loginTruliaUser:function e(t,n){this.save({idToken:t}).then(function(e,t,r){r.status===6?
Q.triggerGoogleSingleTapSignUpNewUserLoginSuccess(e.userId):Q.triggerGoogleSingleTapSignUpExistingUserLoginSuccess(e.userId),n.resolve(e,r)}).fail(function(e)
{Q.triggerGoogleSingleTapSignUpLoginError(!1),n.reject(e)}),_handleGoogleErrorTracking:function e(t){Q.triggerGoogleSingleTapSignUpLoginError(!0,t.reject()),_closeBanner:function e(t)
{this.cancelSingleTapSignUp(),t.reject(),_setLastSeenLocalStorageToken:function e(){localStorage.setItem("lastSeen_googleSingleTapSignUp",(new Date).getTime())},J=function(e)
{function t(){return l(this,t),j(this,t,_.proto_.Object.getPrototypeOf(t)).apply(this,arguments)}return Y(t,e),E(t,{key:"triggerOpenModal",value:function e()
{this._initializeTrackingData(),this._triggerAnalyticsTrackState(),{key:"triggerRegisterSuccess",value:function e(t){this._initializeTrackingData(),this._setInteractedWithData("sign
in modal:native submit"),this._setLoginEndData("1"),this._setRegistrationEnd("1"),this._setTruliaUserId(t),this._triggerAnalyticsTrackAction(),{key:"triggerAgentsLink",value:function e()
{this._triggerAnalyticsInteractedWith("sign in modal:agents link"),this._triggerPageStateChange(),{key:"triggerRegisterSubmitted",value:function e()
{this._initializeTrackingData(),this._setInteractedWithData("sign in modal:native submit"),this._setLoginStartData("1"),this._triggerAnalyticsTrackAction(),
{key:"triggerRegisterFailed",value:function e(t){this._initializeTrackingData(),this._setFormErrorText("error|"+t),this._triggerAnalyticsTrackAction(),t},t(R),X=function(){function
e(t){l(this,e),this._domElement=t,this._id=t.id,this._widgetId=void 0}return E({key:"isRendered",value:function e(){return void
```

(Id.).

34. The Accused Instrumentality performs the step of receiving an advertisement selected in accordance to the user demographic information (e.g., Trulia.com provides advertisements to a user based on demographic information such as age, gender, language, interest, activity, etc.). (E.g., <https://www.zillow.com/corp/Privacy.htm>). For example, the


accused instrumentality has targeted advertising to users based on a user's geography and interest. (*Id.*).


35. The Accused Instrumentality performs the step of executing the template program (*e.g.*, JavaScript templates) using the selected advertisement (*e.g.*, an advertisement selected based on a user's demographic information) to generate the customized page (*e.g.*, a user's Trulia.com page with the advertisement integrated). (*E.g.*, https://www.trulia.com/NY/New_York/ (for a particular user)).

36. The Accused Instrumentality performs the step of providing the customized page to the user (*e.g.*, a user's Trulia.com page with integrated advertisements).


12 Edgewater Park #12A
Bronx, NY 10465 Throggs Neck

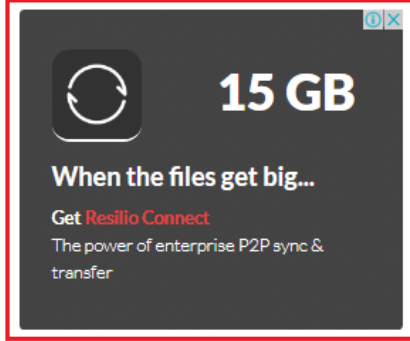
\$199,999

 Save

 Share

Request Info ▾





| What's near 12 Edgewater Park #12A | |
|------------------------------------|------------|
| Starbucks Distance | 1.96 miles |
| Trader Joes Distance | 8.07 miles |
| Whole Foods Distance | 7.45 miles |

| Facts & Figures | |
|-----------------------|--------------|
| Slope of lot | Nearly Level |
| Elevation of property | 16 ft |
| Tree Cover of lot | 11% |

(*E.g.*, <https://www.trulia.com/p/ny/bronx/12-edgewater-park-12a-bronx-ny-10465--2408594313> (for a particular user)).

13636 4th Ave NE
Seattle, WA 98125 **Haller Lake**

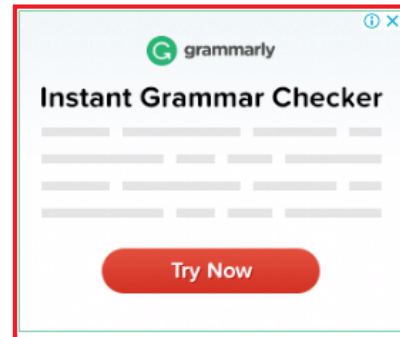
\$300,000

Save

Share

Request Info ▾

Windermere
REAL ESTATE



What's near 13636 4th Ave NE

| | |
|----------------------|------------|
| Starbucks Distance | 0.64 miles |
| Trader Joes Distance | 2.01 miles |
| Whole Foods Distance | 3.73 miles |

Facts & Figures

| | |
|-----------------------|-------------|
| Slope of lot | Very Gentle |
| Elevation of property | 331 ft |
| Tree Cover of lot | 25% |

(E.g., <https://www.trulia.com/p/wa/seattle/13636-4th-ave-ne-seattle-wa-98125--2118788955> (for a particular user)).

37. Plaintiff has been damaged as a result of Defendant's infringing conduct. Defendant is thus liable to Plaintiff for damages in an amount that adequately compensates Plaintiff for such Defendant's infringement of the '854 patent, *i.e.*, in an amount that by law cannot be less than would constitute a reasonable royalty for the use of the patented technology, together with interest and costs as fixed by this Court under 35 U.S.C. § 284.

38. On information and belief, Defendant has had at least constructive notice of the '854 patent by operation of law, and there are no marking requirements that have not been complied with.

IV. COUNT II **(PATENT INFRINGEMENT OF UNITED STATES PATENT NO. 5,983,227)**

39. Plaintiff incorporates the above paragraphs herein by reference.

40. On November 9, 1999, United States Patent No. 5,983,227 (“the ‘227 Patent”) was duly and legally issued by the United States Patent and Trademark Office. The ‘227 Patent is titled “Dynamic Page Generator.” A true and correct copy of the ‘227 Patent is attached hereto as Exhibit B and incorporated herein by reference.

41. Digi Portal is the assignee of all right, title and interest in the ‘227 patent, including all rights to enforce and prosecute actions for infringement and to collect damages for all relevant times against infringers of the ‘227 Patent. Accordingly, Digi Portal possesses the exclusive right and standing to prosecute the present action for infringement of the ‘227 Patent by Defendant.

42. The application leading to the ‘227 patent was filed June 12, 1997. (Ex. B at cover). The ‘227 patent was first assigned to Yahoo! Inc. (*Id.*).

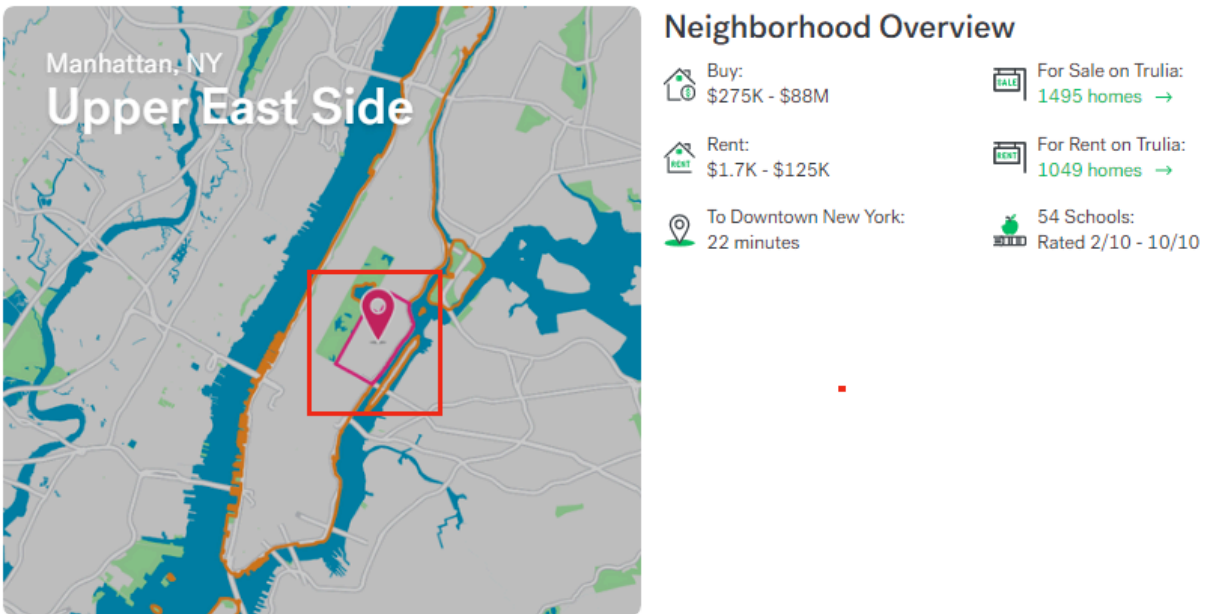
43. The invention in the ‘227 Patent relates to the field of customized information presentation on the web; more specifically, providing customized pages that are quickly served and scalable to handle many users simultaneously. (*Id.* at col. 1:14-18).

44. The ‘227 Patent shares the identical specification as the ‘854 patent and therefore Digi Portal incorporates the background and discussion of the invention in Paragraphs 13-25. Furthermore, as show in the prosecution history of the ‘227 Patent, it was unconventional to download real-time information into a server and use a template for the static data as opposed to linking directly to real-time information. (Ex. E at 5, Ex. F at 2).

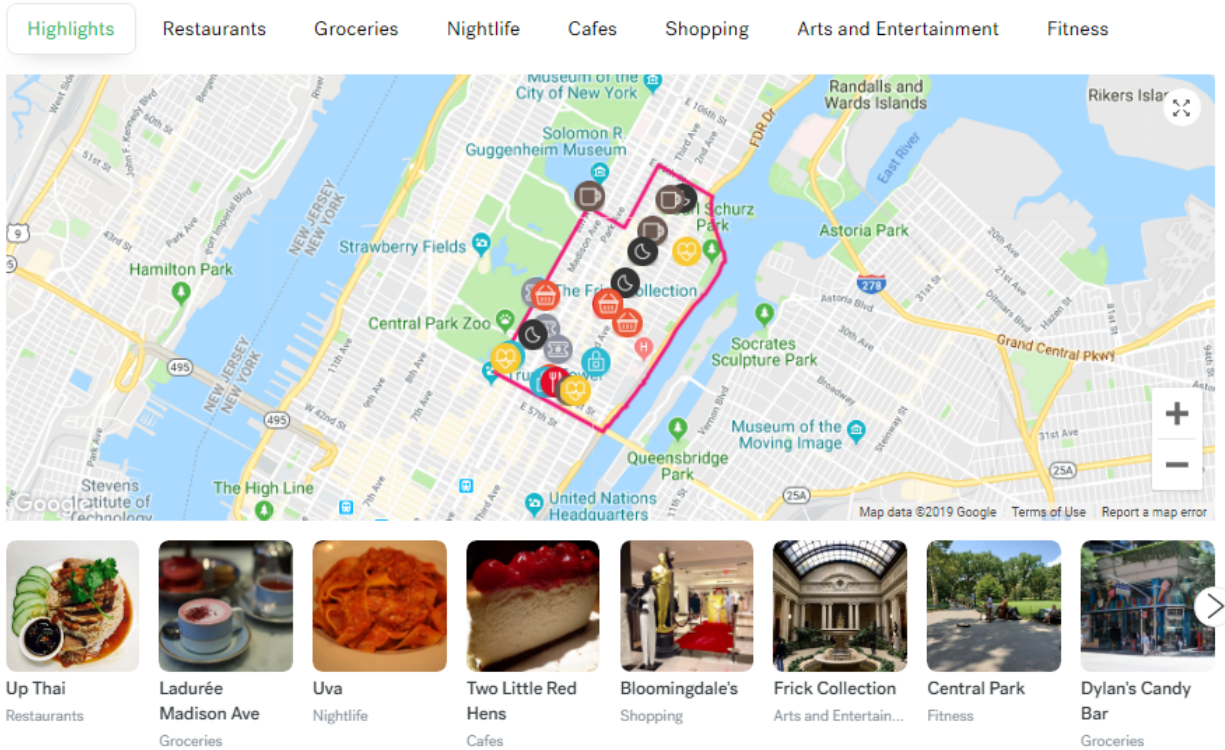
45. **Direct Infringement.** Upon information and belief, Defendant has been directly infringing at least claim 2 of the ‘227 patent in Delaware, and elsewhere in the United States, by performing actions comprising using or performing the claimed method of providing real-time responses to user requests for customized pages, including without limitation through the method

implemented of providing a user's Trulia.com page ("Accused Instrumentality"). (*E.g.*, <https://www.trulia.com/>).

46. The Accused Instrumentality performs the step of obtaining user preferences (e.g., location, beds, prices, etc.), wherein a user's user preferences indicate items of interest to that user. For example, users can customize their location on their Trulia.com page to find current property related deals near their location:



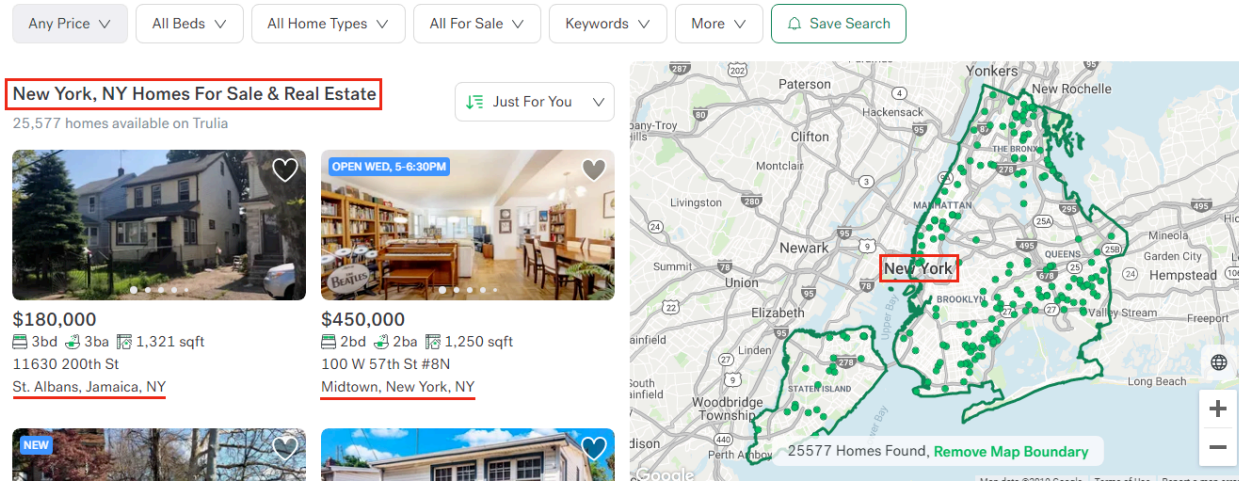
(<https://www.trulia.com/n/ny/new-york/upper-east-side/85381/> (for a particular user)).



(<https://www.trulia.com/n/ny/new-york/upper-east-side/85381/> (for a particular user)).

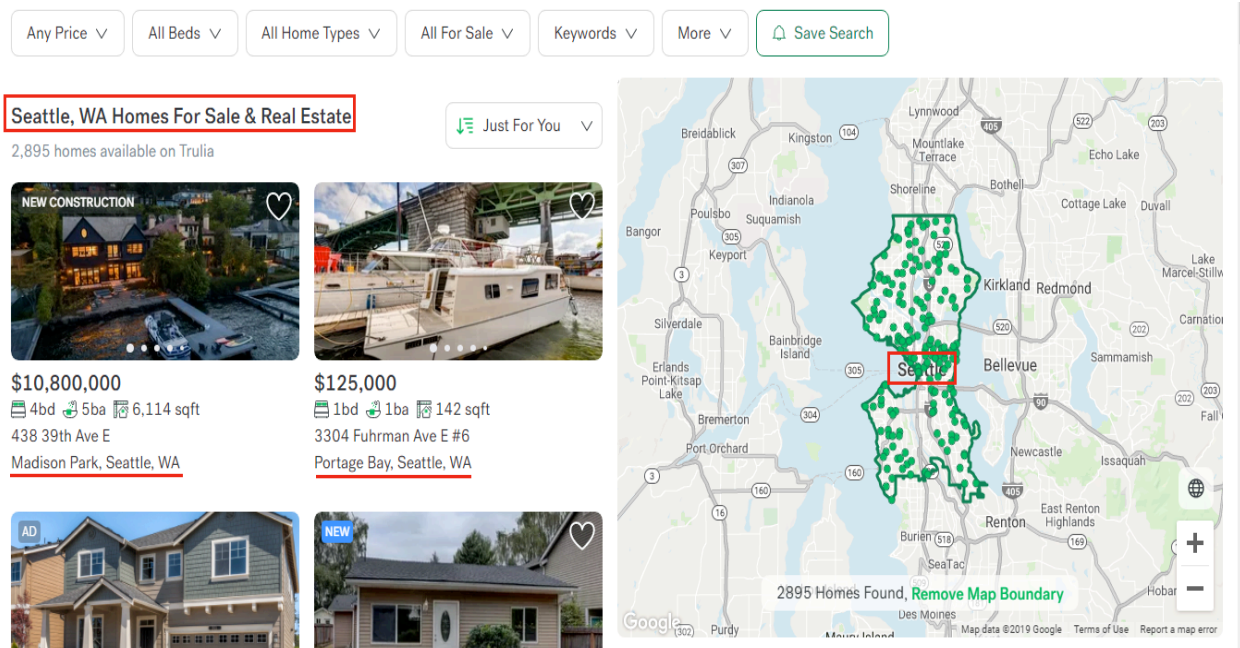
47. The following screenshots are pages for two different users that have varying property related deals (Buy/Rent/Mortgage) displayed based upon the users' respective locations:

First User:



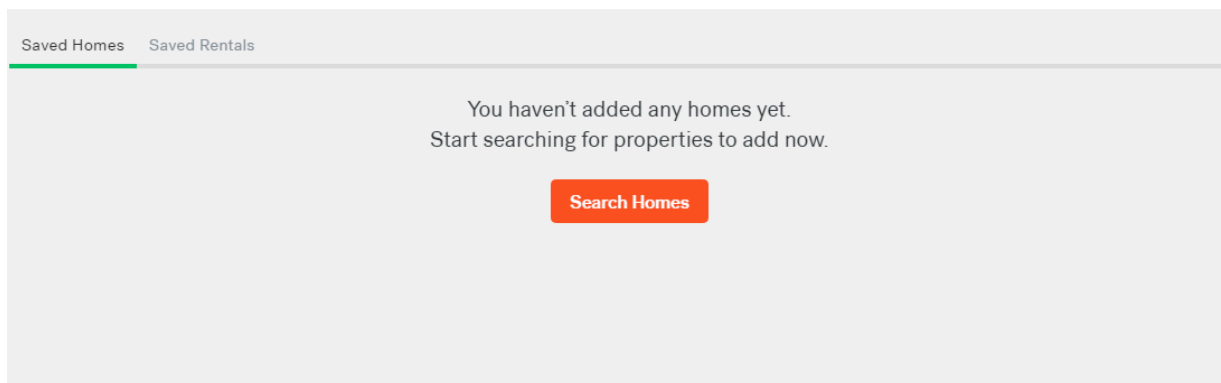
(https://www.trulia.com/NY/New_York/ (for a particular user)).

Second User:

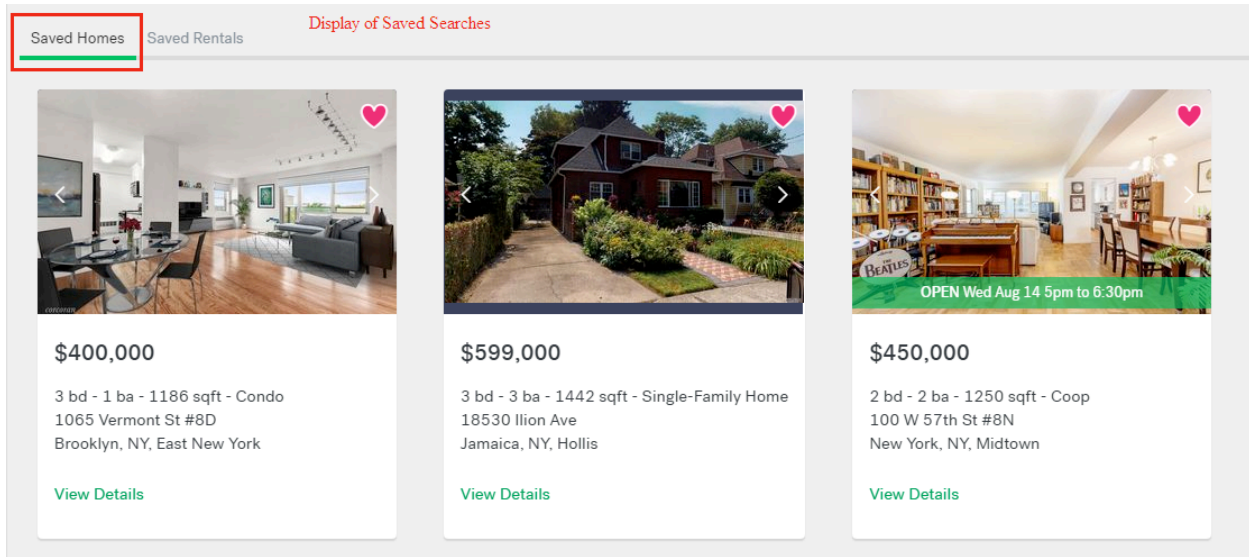


(<https://www.trulia.com/WA/Seattle/> (for a particular user)).

48. Additionally, a user can also customize their Trulia.com page by selecting their saved property related deals (Buy/Rent/Mortgage), so that selected property related deals (Buy/Rent/Mortgage) can be displayed. The following are screenshots pertaining to the selection process:



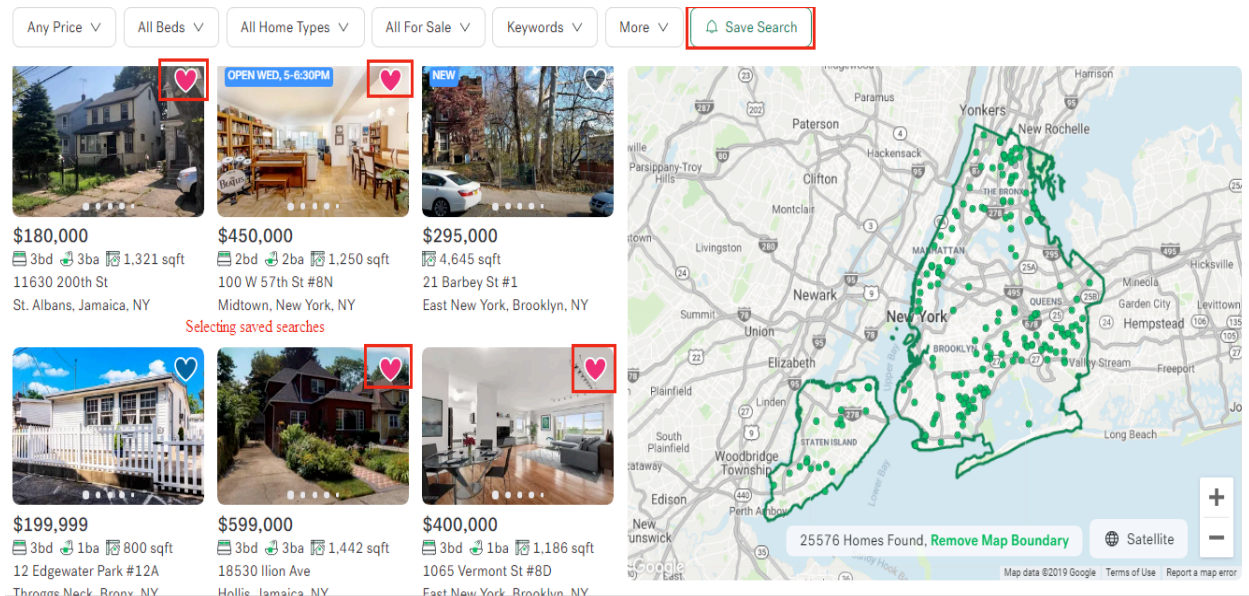
(<https://www.trulia.com/account/properties> (for a particular user)).



(<https://www.trulia.com/account/properties> (for a particular user)).

49. The following screenshots are webpages customized according to the selected property related deals (Buy/Rent/Mortgage) of two respective users:


First User:



(https://www.trulia.com/NY/New_York/ (for a particular user)).

Display of Saved Searches

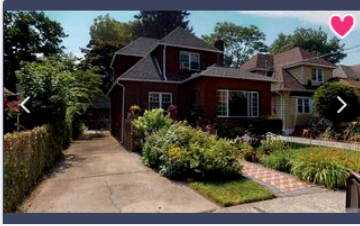
Saved Homes Saved Rentals



\$400,000

3 bd - 1 ba - 1186 sqft - Condo
1065 Vermont St #8D
Brooklyn, NY, East New York


[View Details](#)



\$599,000

3 bd - 3 ba - 1442 sqft - Single-Family Home
18530 Ilion Ave
Jamaica, NY, Hollis

[View Details](#)



\$450,000


2 bd - 2 ba - 1250 sqft - Coop
100 W 57th St #8N
New York, NY, Midtown

[View Details](#)

(<https://www.trulia.com/account/properties> (for a particular user)).

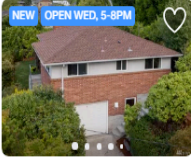
Second User:

Any Price ▾ All Beds ▾ All Home Types ▾ All For Sale ▾ Keywords ▾ More ▾ Saved Search



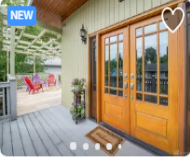
\$397,777

4bd 2ba 1,370 sqft
524 S Director St
South Park, Seattle, WA



\$719,500


3bd 3ba 2,040 sqft
4159 Cascadia Ave S
Mt. Baker, Seattle, WA



\$725,000

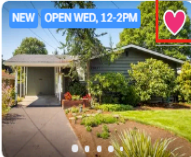
6bd 2ba 2,680 sqft
2807 NE 105th St
Meadowbrook, Seattle, WA

Selecting Saved Searches




\$300,000

3bd 1ba 1,660 sqft
13636 4th Ave NE
Haller Lake, Seattle, WA



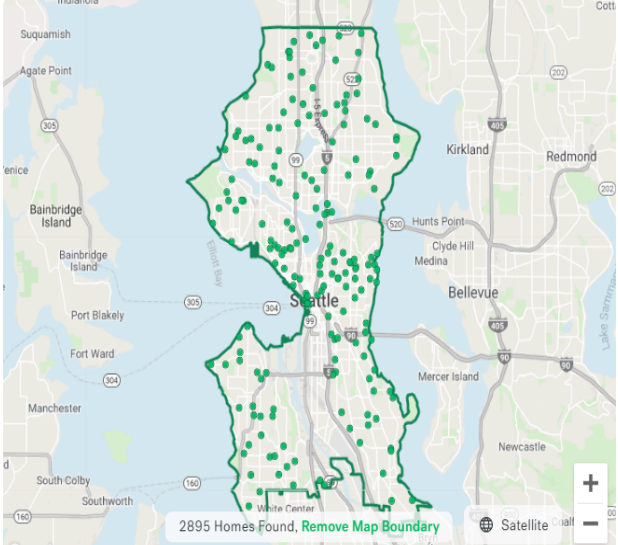
\$649,950

3bd 2ba 1,520 sqft
12041 10th Ave NW
Broadview, Seattle, WA



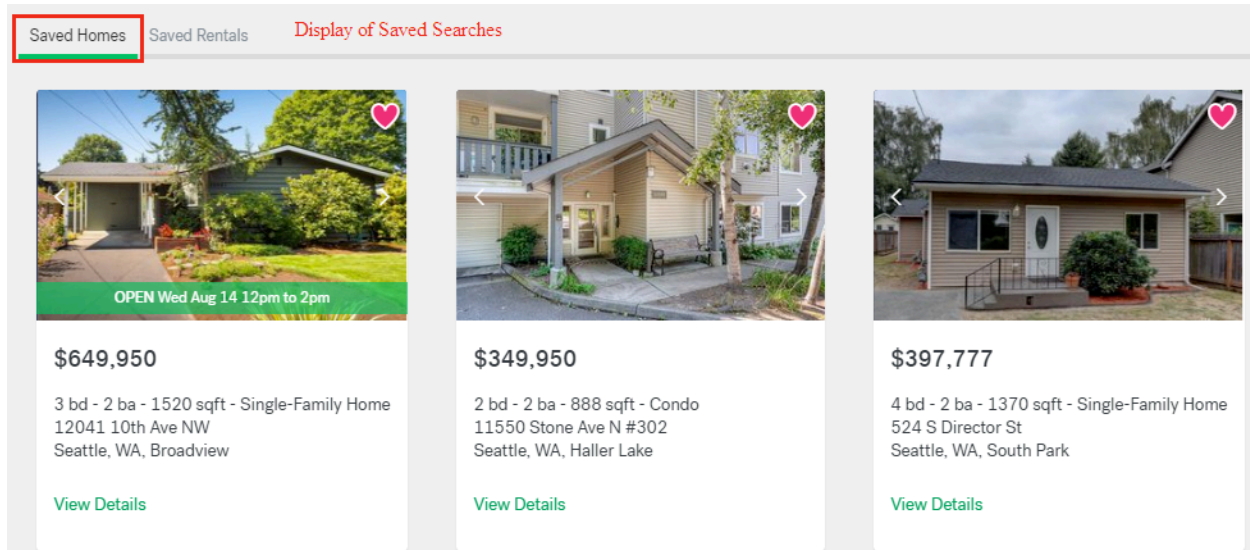
\$349,950

2bd 2ba 888 sqft
11550 Stone Ave N #302
Haller Lake, Seattle, WA



2895 Homes Found, [Remove Map Boundary](#)

(<https://www.trulia.com/WA/Seattle/> (for a particular user)).



(<https://www.trulia.com/account/properties> (for a particular user)).

50. On information and belief, the Accused Instrumentality performs obtaining real-time information (*e.g.*, current property listings and advertisements) from information sources (*e.g.*, Trulia.com's servers/databases which store real-time property listings and the Google server which houses advertisements) and storing the real-time information in a storage device (*e.g.*, the property listings and advertisements will be pulled from a storage server and sent to Trulia.com's web/API server so that the information can be used as input in a template program to generate a customized page that is provided to a user).

51. On information and belief, the Accused Instrumentality performs the step of combining the user preferences for the user (*e.g.*, user location, preferred property, user trends/actions) and a template (*e.g.*, generic template) to form a template program specific to the user. On information and belief, the Accused Instrumentality forms a template program (*e.g.*, software instructions and data used for rendering a particular user's Trulia.com page such as a JavaScript page) that is unique to the user (*e.g.*, JavaScript pages will be specific to a user because the content can be modified by and/or customized for a user) and based on user preferences (*e.g.*, a user can customize the content of their templates and what will be rendered

and displayed using the templates by entering information such as their location). On information and belief, the Accused Instrumentality uses preference information for the user and a global template that is generic to a plurality of users to form a customized template program unique to a user. Running the template program (page generation code, tiles, containers, and user data) creates the customized webpage.

52. On information and belief, the Accused Instrumentality performs the step of receiving, from a user and at the server, a user request for a customized page (*e.g.*, when a user logs in to Trulia.com, property searches will be limited to a user's location and advertisements will be targeted towards a user's interest) customized according to the user preferences. The following screenshots are examples of the request for a customized page that is customized according to the user preferences:

x


Sign in or register to save your favorite homes

Enter email address

Submit

OR

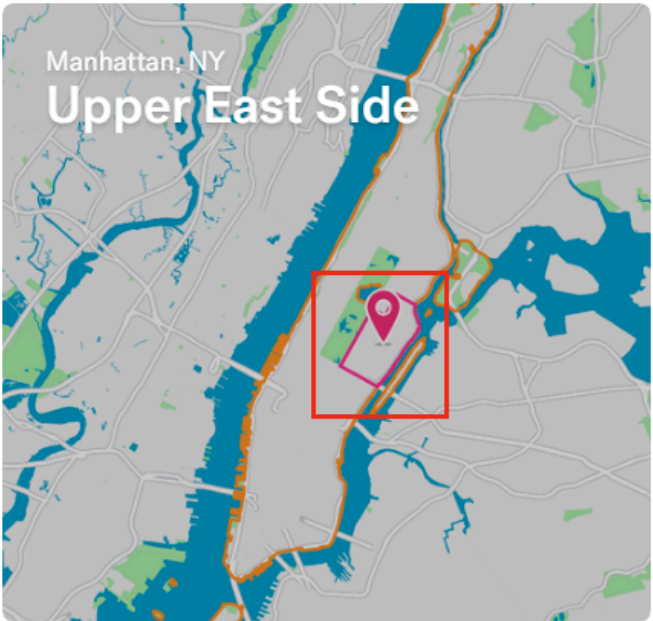
f Continue with Facebook

 Continue with Google

I accept Trulia's [Terms of Use](#) and [Privacy Policy](#).

Are you a Real Estate Professional? [Register here.](#)

(<https://www.trulia.com/> (for a particular user)).



Neighborhood Overview

Buy:
\$275K - \$88M

For Sale on Trulia:
1495 homes →

Rent:
\$1.7K - \$125K

For Rent on Trulia:
1049 homes →

To Downtown New York:
22 minutes

54 Schools:
Rated 2/10 - 10/10

(<https://www.trulia.com/n/ny/new-york/upper-east-side/85381/> (for a particular user)).

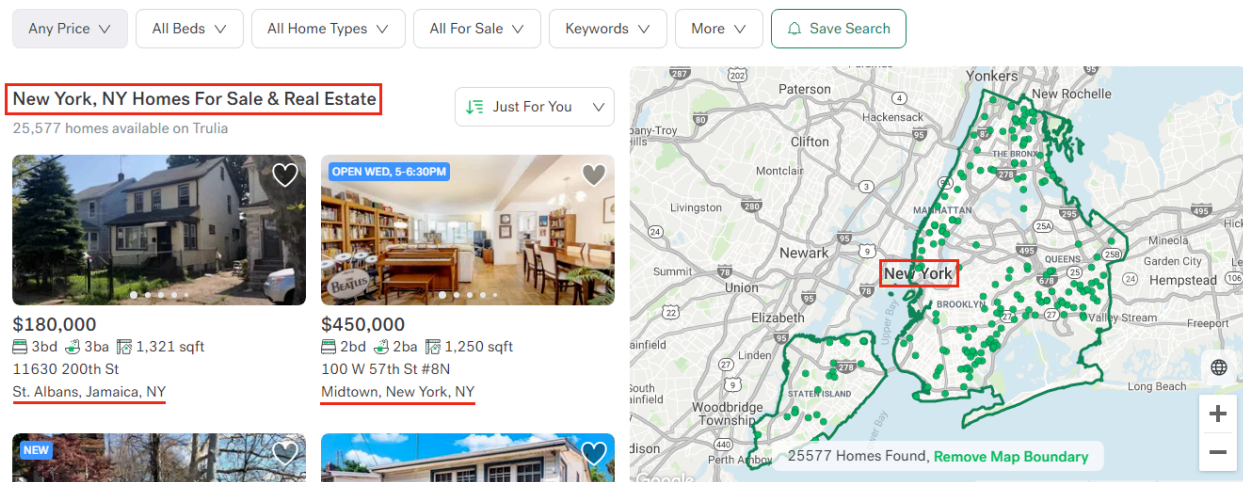
Highlights Restaurants Groceries Nightlife Cafes Shopping Arts and Entertainment Fitness

A detailed map of the Upper East Side neighborhood in Manhattan, NY. The map shows various landmarks and points of interest, including the Museum of the City of New York, Solomon R. Guggenheim Museum, Strawberry Fields, Central Park Zoo, The Frick Collection, The Met, Socrates Sculpture Park, Museum of the Moving Image, Queensbridge Park, United Nations Headquarters, and Grand Central Parkway. The map also shows the East River, Randalls and Wards Islands, and Rikers Island. The map is overlaid with a red rectangular boundary, indicating a specific area of interest. Below the map, there is a list of nearby businesses and points of interest, including Up Thai Restaurants, Ladurée, Uva, Two Little Red Hens, Bloomingdale's, Frick Collection, Central Park, and Dylan's Candy Bar. Each item is accompanied by a small image and a category label.

(<https://www.trulia.com/n/ny/new-york/upper-east-side/85381/> (for a particular user)).


53. The Accused Instrumentality performs the step of executing the template program specific to the user (*e.g.*, page generation code, tiles, containers, and user data) using the real-time information stored in the storage device (*e.g.*, property listings and advertisements, stored in a storage database/server) as input to the template program to generate the customized page (*e.g.*, the property listings and advertisements will be inputted into a template program so that the appropriate web page will be generated and displayed to the user). The following sets of screen screenshots are examples of customizing a user's Trulia.com page from two different users that have varying current property related deals (Buy/Rent/Mortgage) displayed based upon the users' respective locations (*i.e.*, real-time information selected for the user's customized web page based on the customization information unique to the user).

First User:



(https://www.trulia.com/NY/New_York/ (for a particular user)).

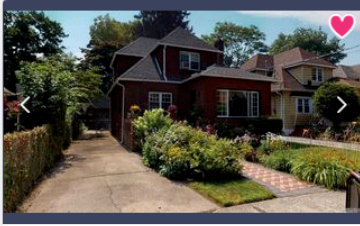
[Saved Homes](#)
[Saved Rentals](#)
[Display of Saved Searches](#)



\$400,000

3 bd - 1 ba - 1186 sqft - Condo
1065 Vermont St #8D
Brooklyn, NY, East New York


[View Details](#)



\$599,000

3 bd - 3 ba - 1442 sqft - Single-Family Home
18530 Ilion Ave
Jamaica, NY, Hollis

[View Details](#)



\$450,000

2 bd - 2 ba - 1250 sqft - Coop
100 W 57th St #8N
New York, NY, Midtown

[View Details](#)

(<https://www.trulia.com/account/properties> (for a particular user)).

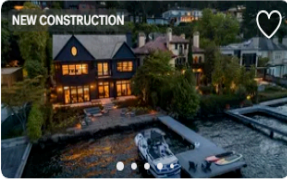
Second User:

[Any Price](#)
[All Beds](#)
[All Home Types](#)
[All For Sale](#)
[Keywords](#)
[More](#)
[Save Search](#)

Seattle, WA Homes For Sale & Real Estate


2,895 homes available on Trulia

[Just For You](#)




\$10,800,000


4bd 5ba 6,114 sqft
438 39th Ave E
[Madison Park, Seattle, WA](#)

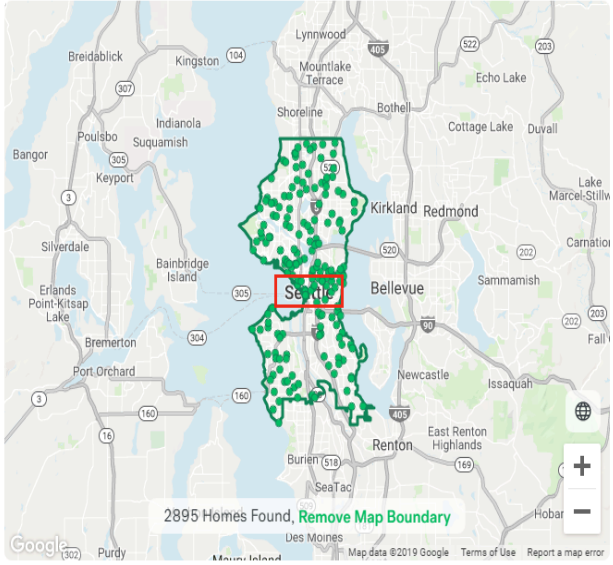


\$125,000

1bd 1ba 142 sqft
3304 Fuhrman Ave E #6
[Portage Bay, Seattle, WA](#)

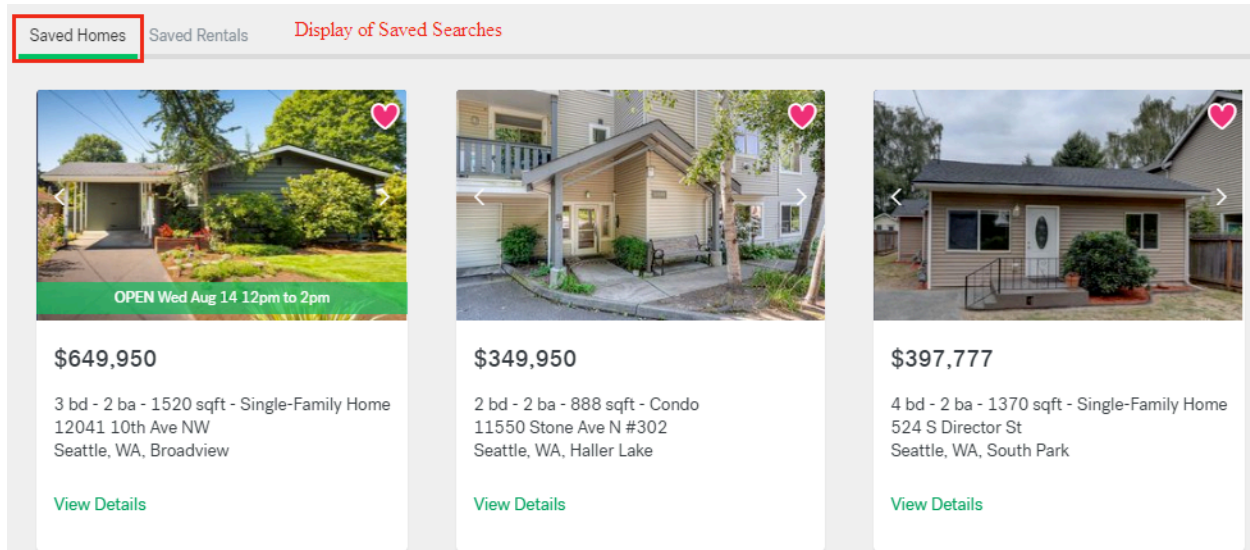






2895 Homes Found, [Remove Map Boundary](#)

(<https://www.trulia.com/WA/Seattle/> (for a particular user)).



(<https://www.trulia.com/account/properties> (for a particular user)).

54. The Accused Instrumentality performs the step of providing the customized page to the user (e.g., a user's Trulia.com page, search results, etc. with integrated advertisements) wherein the steps of executing and providing are performed in real-time response to receipt of the user request in the step of receiving (e.g., user login request, search initiation, etc.) and wherein the customized page includes at least one item of real-time information (e.g., current property related listings (Buy/Rent/Mortgage) or current advertisements) selected from the storage device (e.g., pulled from storage servers/databases and sent to an API/webserver for processing/display). (E.g., screenshots in paragraphs 52 and 53).

55. Plaintiff has been damaged as a result of Defendant's infringing conduct. Defendant is thus liable to Plaintiff for damages in an amount that adequately compensates Plaintiff for such Defendant's infringement of the '227 patent, *i.e.*, in an amount that by law cannot be less than would constitute a reasonable royalty for the use of the patented technology, together with interest and costs as fixed by this Court under 35 U.S.C. § 284.

56. On information and belief, Defendant has had at least constructive notice of the ‘227 patent by operation of law, and there are no marking requirements that have not been complied with.

V. COUNT III
(PATENT INFRINGEMENT OF UNITED STATES PATENT NO. 7,171,414)

57. Plaintiff incorporates the above paragraphs herein by reference.

58. On January 30, 2007, United States Patent No. 7,171,414 (“the ‘414 Patent”) was duly and legally issued by the United States Patent and Trademark Office. The ‘414 Patent is titled “Dynamic Page Generator.” A true and correct copy of the ‘414 Patent is attached hereto as Exhibit G and incorporated herein by reference.

59. Digi Portal is the assignee of all right, title and interest in the ‘414 patent, including all rights to enforce and prosecute actions for infringement and to collect damages for all relevant times against infringers of the ‘414 Patent. Accordingly, Digi Portal possesses the exclusive right and standing to prosecute the present action for infringement of the ‘414 Patent by Defendant.

60. The application leading to the ‘414 patent was filed September 10, 1999, which was a continuation of application no. 08/873,975, which issued as the ‘227 patent. (Ex. G at cover). The ‘414 patent was first assigned to Yahoo! Inc. (*Id.*).

61. The invention in the ‘414 Patent relates to the field of customized information presentation on the web; more specifically, providing customized pages that are quickly served and scalable to handle many users simultaneously. (*Id.* at col. 1:29-33).

62. The ‘414 Patent shares the identical specification as the ‘854 patent and therefore Digi Portal incorporates the background and discussion of the invention in Paragraphs 13-25. Furthermore, the prosecution history of the ‘414 patent highlights advantages and

unconventional features of the claimed invention including the “storing real-time information in a shared local storage device.” An example of this limitation is when live data used to fill templates is stored local to the page server which is handling user requests for custom web pages. (Ex. I at 8; Ex. G at col. 2:11-15). Every piece of information that a person can request on a page is storable in a shared memory closely coupled to a page generator. (Ex. I at 9; Ex. G at col. 4:43-58). Unlike the prior art CGI process that required time consuming calls to other servers, storing real-time information in a shared local storage device, allows for any custom page to be built within the page server thereby eliminating the need to make requests from other servers for portions of the live data. (Ex. I at 9; Ex. G at col. 2:25-31).

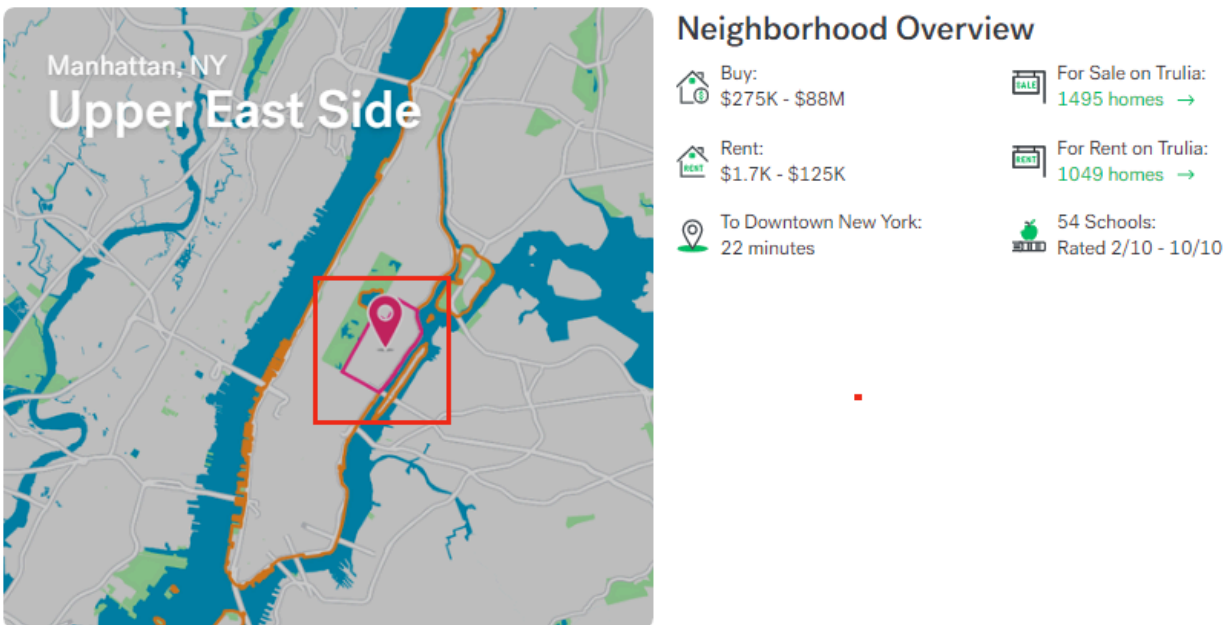
63. Furthermore, as show in the prosecution history of the ‘414 Patent, it was unconventional to receive the template program from one of at least two location, the frequency of the user request for the customized page determines the retrieval location of the template program. (Ex. H at 9-10). In the prior art, the published web site was stored on a server and provided from one server location regardless of the frequency of the user requests for the web site. (*Id.*). The examiner agreed that the claim was allowable because the prior art did not disclose that in a page server coupled to a network a method of providing a customized page to a user, the customized page is customized according to the user’s preferences, and the template is received from one of at least two locations, the location determined from frequency of the user request for the customized page. (Ex. J at 3).

64. **Direct Infringement.** Upon information and belief, Defendant has been directly infringing at least claims 1 and 3 of the ‘414 patent in Delaware, and elsewhere in the United States, by performing actions comprising using or performing the claimed method using the Trulia.com website (“Accused Instrumentality”). The Accused Instrumentality uses a page

server (*e.g.*, the Trulia.com server), to provide a customized page (*e.g.*, user-specific web page, search results, etc.) to a user, wherein the customized page is customized according to the user's preferences (*e.g.*, user location, user interests, etc.).

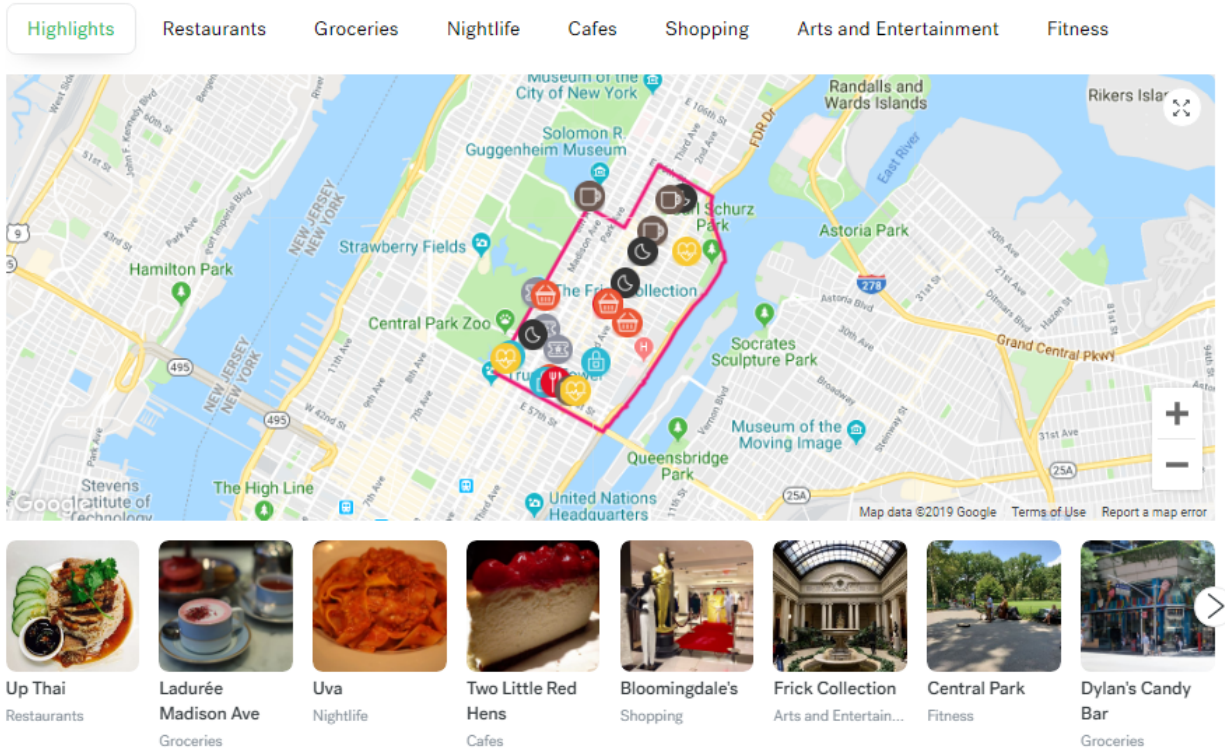
65. On information and belief, the Accused Instrumentality performs the step of obtaining real-time information (*e.g.*, current property related deals (Buy/Rent/Mortgage) and advertisements) from information sources (*e.g.*, storage servers/databases that store property listings and advertisements) and stores them in a shared local storage device (*e.g.*, the data will be pulled from storage servers/databases and stored, at least temporarily, at a local web/API server, for processing and subsequent display to a user).

66. For example, users can customize their location on their Trulia.com page to find current property related deals (Buy/Rent/Mortgage) near their location:



(<https://www.trulia.com/n/ny/new-york/upper-east-side/85381/> (for a particular user)).

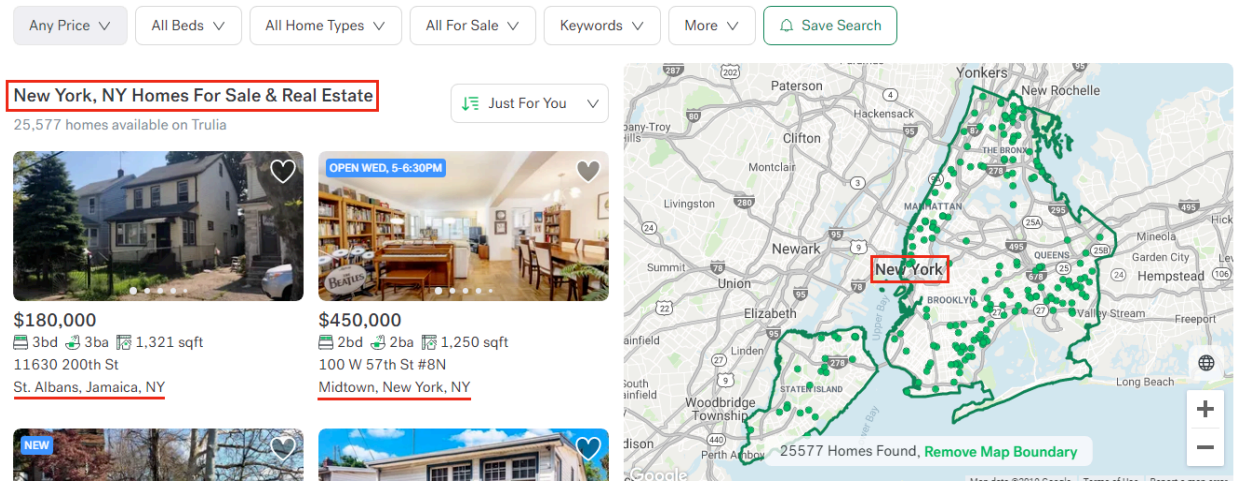
Furthermore, a user's Trulia.com page is customized by the location information provided by the user:



(<https://www.trulia.com/n/ny/new-york/upper-east-side/85381/> (for a particular user)).

67. As another example, a user's Trulia.com page will also be customized to show current property related deals (Buy/Rent/Mortgage) near the location linked to a user's account.

First User:



(https://www.trulia.com/NY/New_York/ (for a particular user)).

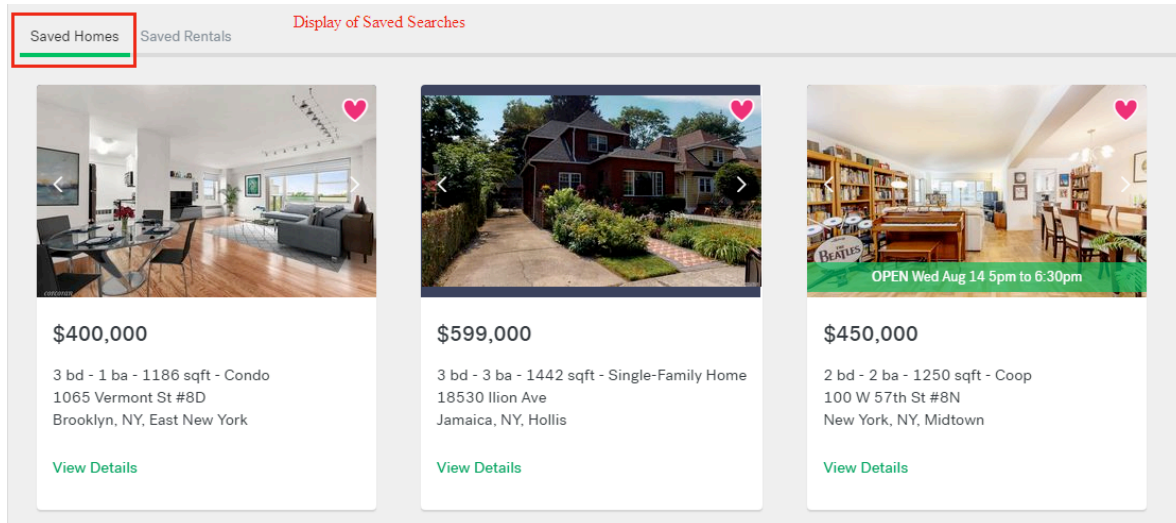
Second User:

The screenshot displays the Trulia search interface for Seattle, WA. At the top, there are filter buttons: 'Any Price', 'All Beds', 'All Home Types', 'All For Sale', 'Keywords', 'More', and a 'Save Search' button. Below these, the search results are titled 'Seattle, WA Homes For Sale & Real Estate' with a sub-header '2,895 homes available on Trulia'. A 'Just For You' dropdown menu is visible. The main content area features a grid of property listings. The first listing is a 'NEW CONSTRUCTION' house for \$10,800,000, located at 438 39th Ave E, Madison Park, Seattle, WA. The second listing is a boat for \$125,000, located at 3304 Fuhrman Ave E #6, Portage Bay, Seattle, WA. To the right of the listings is a map of the Seattle area with a green boundary around the city center, indicating the search area. The map shows various neighborhoods and landmarks. At the bottom of the map, it says '2895 Homes Found, Remove Map Boundary'.

(<https://www.trulia.com/WA/Seattle/> (for a particular user)). A user can also customize their Trulia.com page by selecting their saved Property related deals (Buy/Rent/Mortgage), so that selected Property related deals (Buy/Rent/Mortgage) can be displayed. Below are screenshots pertaining to the selection process.

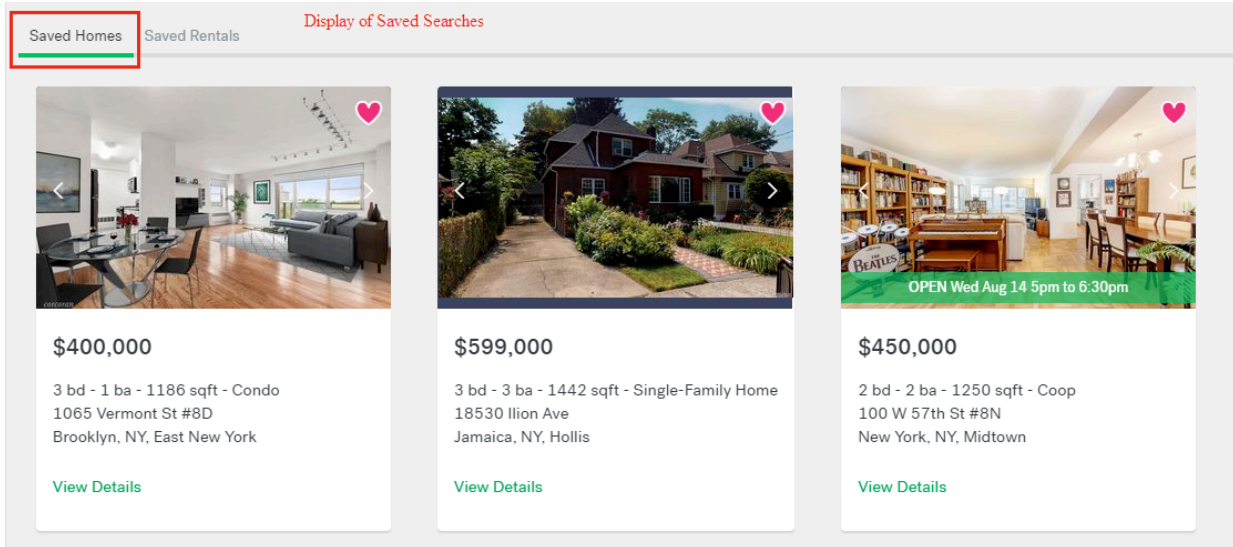
The screenshot shows the 'Saved Homes' section of a user's Trulia account. The page has a header with 'Saved Homes' and 'Saved Rentals' tabs. The main content area is a light gray box with the text: 'You haven't added any homes yet. Start searching for properties to add now.' Below this text is a red button labeled 'Search Homes'.

(<https://www.trulia.com/account/properties> (for a particular user)).



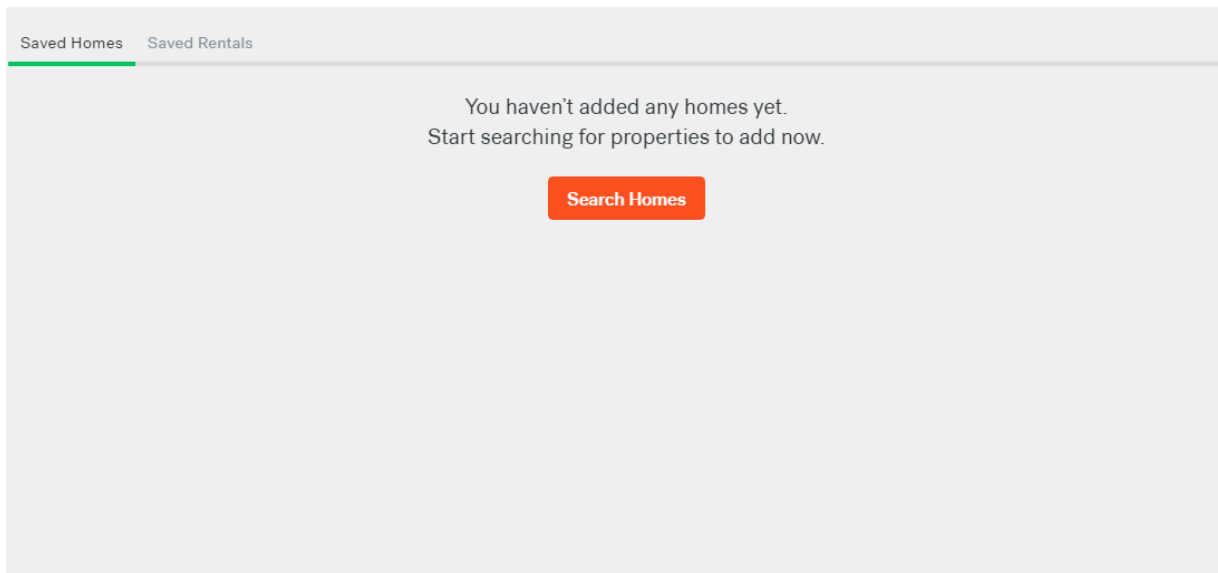
(<https://www.trulia.com/account/properties> (for a particular user)).

68. On information and belief, the Accused Instrumentality performs the step of storing a user-specific template program (*e.g.*, generic template customized to a user-specific template program based on user-specific interests and with real-time information) for the user in a data structure associated with a user identifier unique to the user (*e.g.*, the user-specific template is stored corresponding to every user based on the user's unique preferences and information associated with the user's sign-in information (*e.g.*, e-mail address)). Upon information and belief, after a user logs in, Trulia.com can display a user's saved/recent searches. As such, a user-specific template program utilized to create the displayed websites that show a user's recent searches must be stored in a database wherein the template program is tied to a user's log in information/account.



(<https://www.trulia.com/account/properties> (for a particular user)).


69. A user can also customize their Trulia.com page by selecting their saved property related deals (Buy/Rent/Mortgage), so that selected property related deals (Buy/Rent/Mortgage) can be displayed. Upon information and belief, in order to display the selected property of interest to a user following their login, Trulia.com must store the template programs utilized to render the pages in a database, and tie the template programs to a user's account. Below are screenshots pertaining to the selection process:



(<https://www.trulia.com/account/properties> (for a particular user)).

Display of Saved Searches

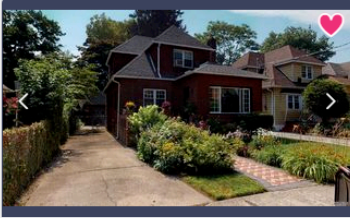
Saved Homes Saved Rentals



\$400,000

3 bd - 1 ba - 1186 sqft - Condo
1065 Vermont St #8D
Brooklyn, NY, East New York


[View Details](#)



\$599,000

3 bd - 3 ba - 1442 sqft - Single-Family Home
18530 Ilion Ave
Jamaica, NY, Hollis

[View Details](#)



\$450,000

2 bd - 2 ba - 1250 sqft - Coop
100 W 57th St #8N
New York, NY, Midtown


[View Details](#)

OPEN Wed Aug 14 5pm to 6:30pm

(<https://www.trulia.com/account/properties> (for a particular user)). The following the screenshots of webpages customized according to the selected property related deals (Buy/Rent/Mortgage) of two respective users:


First User

Any Price ▾ All Beds ▾ All Home Types ▾ All For Sale ▾ Keywords ▾ More ▾ [Save Search](#)



\$180,000

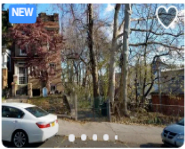
3bd 3ba 1,321 sqft
11630 200th St
St. Albans, Jamaica, NY



\$450,000


2bd 2ba 1,250 sqft
100 W 57th St #8N
Midtown, New York, NY

Selecting saved searches




\$295,000

4,645 sqft
21 Barbey St #1
East New York, Brooklyn, NY



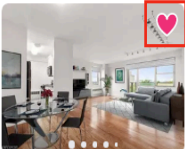
\$199,999

3bd 1ba 800 sqft
12 Edgewater Park #12A
Thronex Neck, Bronx, NY



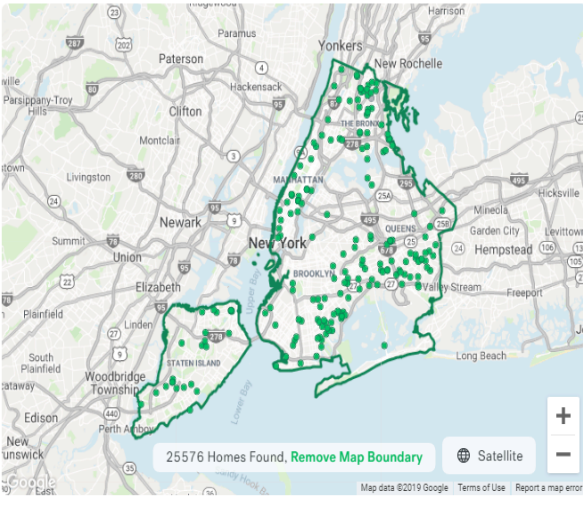
\$599,000

3bd 3ba 1,442 sqft
18530 Ilion Ave
Hollis, Jamaica, NY



\$400,000

3bd 1ba 1,186 sqft
1065 Vermont St #8D
East New York, Brooklyn, NY



Map data ©2019 Google Terms of Use Report a map error

(https://www.trulia.com/NY/New_York/ (for a particular user)).

Saved Homes

Saved Rentals

Display of Saved Searches

\$400,000

3 bd - 1 ba - 1186 sqft - Condo
1065 Vermont St #8D
Brooklyn, NY, East New York

[View Details](#)

\$599,000

3 bd - 3 ba - 1442 sqft - Single-Family Home
18530 Ilion Ave
Jamaica, NY, Hollis

[View Details](#)

\$450,000

2 bd - 2 ba - 1250 sqft - Coop
100 W 57th St #8N
New York, NY, Midtown

[View Details](#)

(<https://www.trulia.com/account/properties> (for a particular user)).

Second User

Any Price ▾

All Beds ▾

All Home Types ▾

All For Sale ▾

Keywords ▾

More ▾

Saved Search

\$397,777

4bd 2ba 1,370 sqft
524 S Director St
South Park, Seattle, WA

\$719,500

3bd 3ba 2,040 sqft
4159 Cascadia Ave S
Mt. Baker, Seattle, WA

\$725,000

6bd 2ba 2,680 sqft
2807 NE 105th St
Meadowbrook, Seattle, WA

Selecting Saved Searches

\$300,000

3bd 1ba 1,660 sqft
13636 4th Ave NE
Haller Lake, Seattle, WA

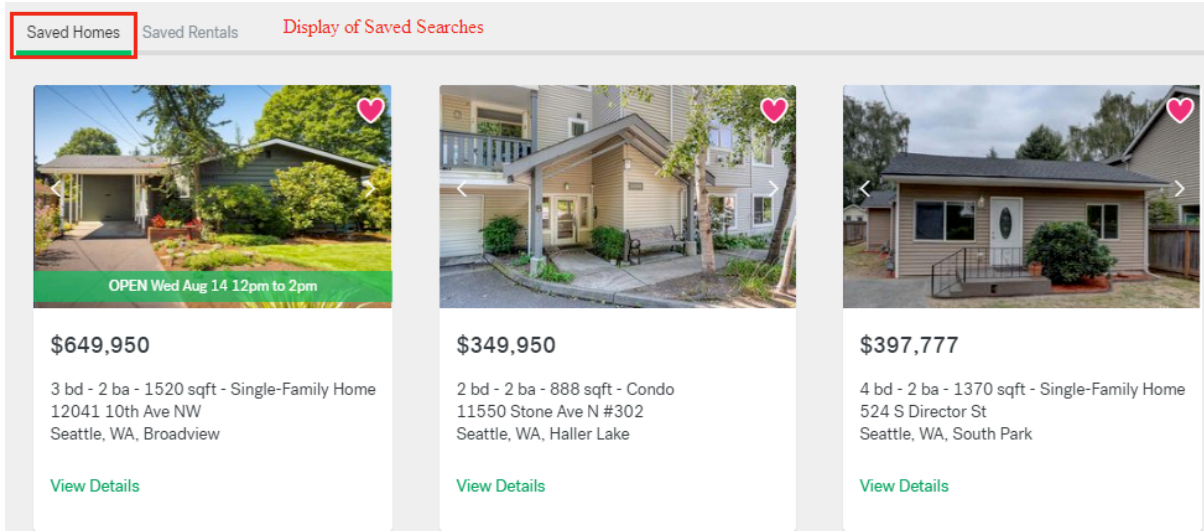
\$649,950

3bd 2ba 1,520 sqft
12041 10th Ave NW
Broadview, Seattle, WA

\$349,950

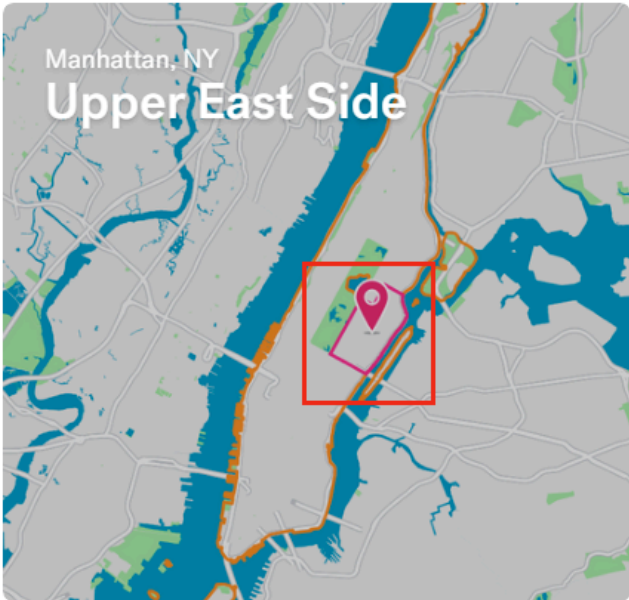
2bd 2ba 888 sqft
11550 Stone Ave N #302
Haller Lake, Seattle, WA

(<https://www.trulia.com/WA/Seattle/> (for a particular user)).



(<https://www.trulia.com/account/properties> (for a particular user)).

70. Upon information and belief, the Accused Instrumentality performs the step of receiving, from the user and at the page server (*e.g.*, Trulia.com server), a user request (*e.g.*, user login, search initiation, etc.) for a customized page (*e.g.*, search results limited to a user's location, pages with advertisements targeted to a user's interest, etc.) and determining a user identifier associated with the request (*e.g.*, in order to limited search results to a location tied to an account, or Trulia.com must determine a user identifier that links the request to the user's account and preferences).



Manhattan, NY
Upper East Side

Neighborhood Overview

Buy:
\$275K - \$88M

Rent:
\$1.7K - \$125K

To Downtown New York:
22 minutes


For Sale on Trulia:
1495 homes →

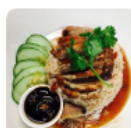
For Rent on Trulia:
1049 homes →

54 Schools:
Rated 2/10 - 10/10


(<https://www.trulia.com/n/ny/new-york/upper-east-side/85381/> (for a particular user)).

Highlights
Restaurants
Groceries
Nightlife
Cafes
Shopping
Arts and Entertainment
Fitness







Up Thai
Restaurants




**Ladurée
Madison Ave**
Groceries



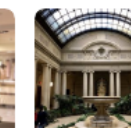
Uva
Nightlife




**Two Little Red
Hens**
Cafes




Bloomingdale's
Shopping



Frick Collection
Arts and Entertain...

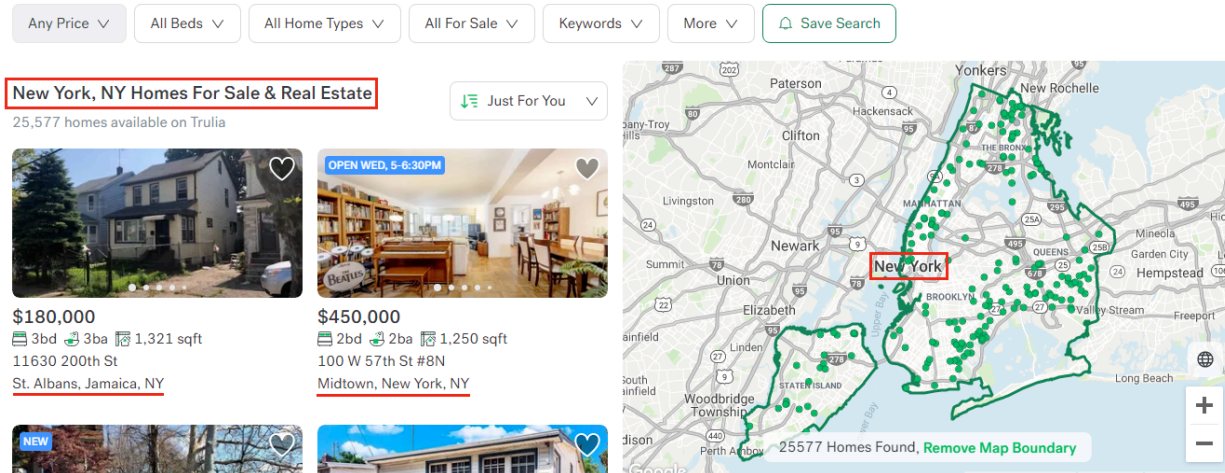


Central Park
Fitness

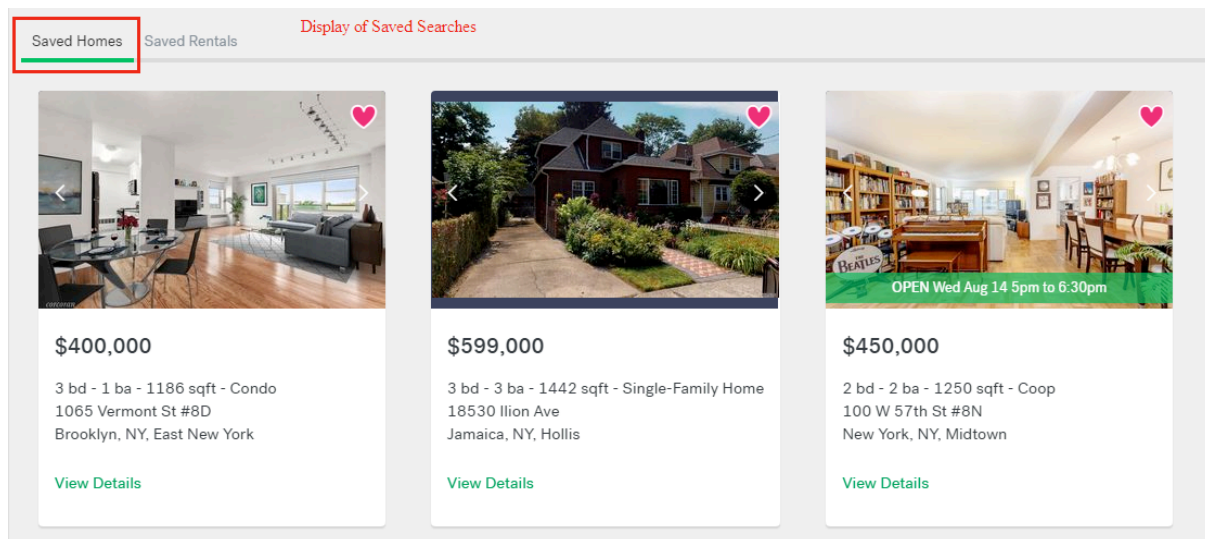


**Dylan's Candy
Bar**
Groceries

(<https://www.trulia.com/n/ny/new-york/upper-east-side/85381/> (for a particular user)).

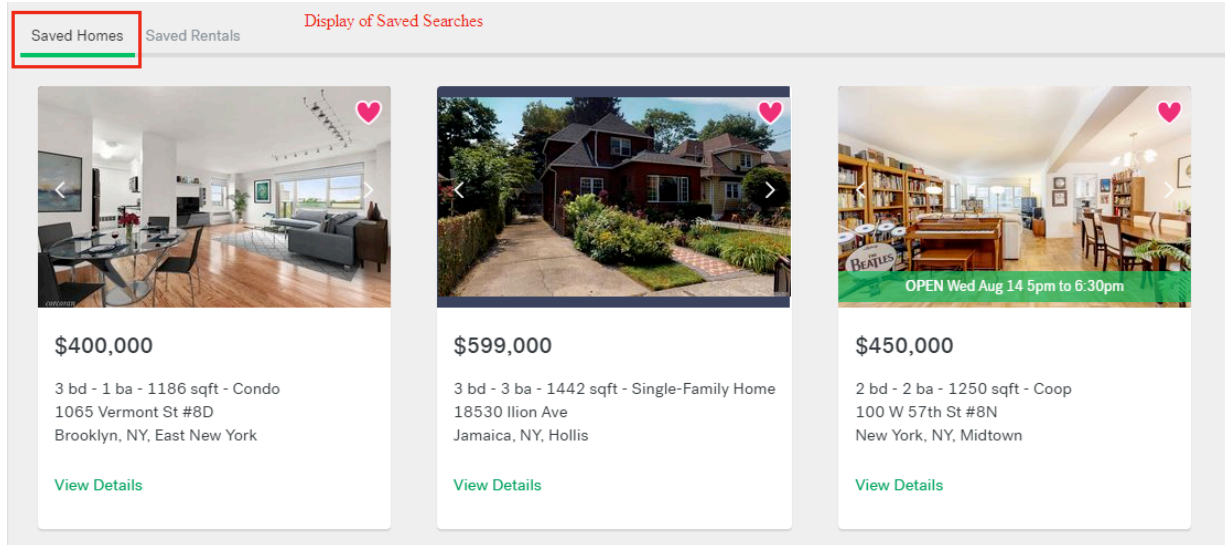


(https://www.trulia.com/NY/New_York/ (for a particular user)).



(<https://www.trulia.com/account/properties> (for a particular user)).

71. On information and belief, the Accused Instrumentality performs the step of receiving a template program specific to the user using the determined user identifier (*e.g.*, user id and password) associated with the user request (*e.g.*, user login request). On information and belief, in order to display a webpage that shows search results limited to a user's location, and saved properties, Trulia.com must receive a template program (*e.g.*, code, instructions, etc., used to create a webpage for display) tied to a user's account/preferences.



(<https://www.trulia.com/account/properties> (for a particular user)).

72. On information and belief, the Accused Instrumentality performs the step that the template program is received from one of at least two locations (*e.g.*, main storage at the Trulia.com server or local storage on the user's computer), the location determined from frequency of the user request for the customized page. On information and belief, template information that is part of the template program is stored for less frequently accessed files in the main storage and for more frequently accessed files in storage on the user's computer. Running the template program (page generation code, tiles, containers, and user data) creates the customized webpage. On information and belief, when a user signs-up or performs a login, the code takes the user template information and stores it in a site Javascript object that is used in logic to display various available property related deals (Buy/Rent/Mortgage) and other site logic-based conditions. On information and belief, the template information is stored in multiple locations: (1) at runtime, in a Javascript object with the data structure called Context Data; (2) within browser local storage; and (3) browser cookies.


```

r.getNodeFromInstance(e):null}},Mount:a,Reconciler:o}};var h,m,_j,v,g,b,w,k,M;e.exports=p,function(e,t,n){function r(e,t){return
1===e.nodeType&&e.getAttribute(m)===String(t)||8===e.nodeType&&e.nodeValue===e.react-text:"++" "||8===e.nodeType&&e.nodeValue===e.react-empty:"++"}function i(e){for(var
t;t=e.renderedComponent;t=t.return e}function a(e,t){var n=i(e);n._hostNode=t,t[y]=n}function o(e){var t=e._hostNode;t&&(delete t[y],e._hostNode=null)}function s(e,t){if(!
(e.flags&.hasCachedChildNodes)){var n=e.renderedChildren,o=t.firstChild;for(var s in n)if(n.hasOwnProperty(s)){var u=n[s],l=i(u).domID;if(0===l)
for(;;null===o;o=o.nextSibling)if(r(o,l)){a(u,o);continue e}d("32",l)}e._flags|=_.hasCachedChildNodes}function u(e){if(e[y])return e[y];for(var t=t[j];e[y];)
if(t.push(e),e._parentNode)return null;e._parentNode=for(var n,r;e&&(r=e[y]);e=t.pop())n=r,t.length&&s(r,e);return n}function l(e){var t=u(e);return null===t&&t._hostNode===e?
t:null}function c(e){if(void 0===e._hostNode&&("33"),e._hostNode)return e._hostNode;for(var t=
[];e._hostNode;t.push(e),e._hostParent[d("34")],e=e._hostParent;for(;t.length;e=t.pop())s(e,e._hostNode);return e._hostNode}var
d=n(37),f=n(38),p=n(40),h=n(39),m=f.ID_ATTRIBUTE_NAME,_=p.y="__reactInternalInstance$"+Math.random().toString(36).slice(2),v=
{getClosestInstanceFromNode:u,getInstanceFromNode:l,getNodeFromInstance:c,precacheChildNodes:s,precacheNode:a,uncacheNode:o};e.exports=v},function(e,t){function n(e)
for(var t=arguments.length-1,n="Minified React error #"+t; visit http://facebook.github.io/react/docs/error-decoder.html?
invariant="+e,r=n;0<r;r++)n+="<arg>["+encodeURIComponent(arguments[r+1])+"]</arg>"; for the full message or use the non-minified dev environment for full errors and additional helpful
warnings.";var i=new Error(n);throw i.name="Invariant Violation",i.framesToPop=1,i,e.exports=n},function(e,t,n){function r(e,t){return(e&t)===t}var i=n(37),a=n(39),o=
{HOST_USE_PROPERTY:1,HAS_BOOLEAN_VALUE:4,HAS_NUMERIC_VALUE:8,HAS_POSITIVE_NUMERIC_VALUE:24,HAS_OVERLOADED_BOOLEAN_VALUE:32,injectDOMPropertyConfig:function(e){var t=o,n=e.Properties||
[],a=e.DOMAttributeNamespaces||[],s=e.DOMAttributeNames||[],l=e.DOMPropertyNames||[],c=e.DOMMutationMethods||

```

(<https://static.trulia->

cdn.com/javascript/140a0b7/include/js/_built/combo/site_js_new.31d1b1e8686c06ab56722.js (for a particular user)).

```

{z:googleYolo,t.resolve(z)},_hintYoloPromise:function e(){var t=this;return z.hint({supportedAuthMethods:["https://accounts.google.com"],supportedIdTokenProviders:
[uri:"https://accounts.google.com",clientId:t.clientId]}),cancelSingleTapSignUp:function e(){
this._setLastSeenLocalStorageToken(),z.cancelLastOperation(),isGoogleOneTapSignUpEnabled:function e(){return this.isGoogleOneTapSignUpEnabled},login:function e(){var
t=s.Deferred(),n=this;return this._loadGoogleYoloClient().then(function(t){n._hintYoloPromise().then(function(e){e&&e.idToken&&n._loginTruliaUser(e.idToken,t)},function(e)
{n._closeBanner(t)}),function(e){n._handleGoogleErrorTracking(t)},t.promise(),_loginTruliaUser:function e(t,n){this._save({idToken:t}).then(function(e,t,r){r.status===6?
Q.triggerGoogleSingleTapSignUpNewUserLoginSuccess(e.userId):Q.triggerGoogleSingleTapSignUpExistingUserLoginSuccess(e.userId),n.resolve(e,r)}).fail(function(e)
{Q.triggerGoogleSingleTapSignUpLoginError(1),n.reject(e)}),_handleGoogleErrorTracking:function e(t){Q.triggerGoogleSingleTapSignUpLoginError(10),t.reject(),_closeBanner:function e(t)
{this._cancelSingleTapSignUp(),t.reject(),_setLastSeenLocalStorageToken:function e(){localStorage.setItem("lastSeenGoogleSingleTapSignUp",new Date().getTime())},j=function(e)
function t(){return L(this,t),j(this,t,_proto_.Object.getPrototypeOf(t)).apply(this,arguments)}return Y(t,e),E(t,{key:"triggerOpenModal",value:function e()
{this._initializeTrackingData(),this._triggerAnalyticsTrackState(),{key:"triggerRegisterSuccess",value:function e(t){this._initializeTrackingData(),this._setInteractedWithData("sign
in modal:native submit"),this._setLoginEndData("1"),this._setTruliaUserId(t),this._triggerAnalyticsTrackAction(),{key:"triggerAgentsLink",value:function
e(){this._triggerAnalyticsInteractedWithData("sign in modal:agents link"),this._triggerPageStateChange(),{key:"triggerRegisterSubmitted",value:function e()
{this._initializeTrackingData(),this._setInteractedWithData("sign in modal:native submit"),this._setLoginStartData("1"),this._triggerAnalyticsTrackAction(),{
key:"triggerRegisterFailed",value:function e(t){this._initializeTrackingData(),this._setFormErrorText("error"+t),this._triggerAnalyticsTrackAction(),t},t(R),X=function(){function
e(t){l(this,e),this._domElement=t,this._id=t._id,this._widgetId=void 0}return E(e,{key:"isRendered",value:function e(){return void

```

(Id. (for a particular user)).

73. On information and belief, the Accused Instrumentality performs the step of executing the template program (e.g., code, instructions, etc.) specific to the user (e.g., used to create a user-specific web page) using the real-time information (e.g., current property related deals (Buy/Rent/Mortgage), targeted advertisements, etc.) stored in the shared local storage device (e.g., current property related deals (Buy/Rent/Mortgage) and advertisements are pulled from storage servers/databases and sent to a web/API server used to process the data for display; the web/API server is local to Trulia.com and is shared among all users accessing the Trulia.com website) to generate the customized page (e.g., a user webpage displaying property listings, etc., customized for a user based on their preferences). For example, the screenshots in Paragraph 71 are for two different users that have varying current property-related deals displayed based upon the users' respective locations and saved property related deals (buy/rent/mortgage) (i.e., real-

time information selected for the user's customized web page based on the customization information unique to the user such as current property listings).

74. On information and belief, the Accused Instrumentality performs the step that the template program indicates items of interest (*e.g.*, property listings related to the user location, advertisements tied to a user's interest, etc.) to the user; and providing the user with the customized page (*e.g.*, user-specific web page). Users have varying current property related deals (Buy/Rent/Mortgage) displayed based upon the users' respective locations (*i.e.*, real-time information selected for the user's customized web page based on the customization information unique to the user such as current property related deals (Buy/Rent/Mortgage)).

75. On information and belief, the Accused Instrumentality performs the step of receiving user preferences (*e.g.*, user location/selected property, etc.) for the user, wherein the user preferences indicate the items of interest to the user (*e.g.*, property listings near a user, advertisements tied to a user's interest, etc.) and combining the user preferences with a generic template to form the template program specific to the user. On information and belief, the Accused Instrumentality uses a template program that is unique to the user to generate a customized webpage by combining customization information unique to the user and a global template that is generic to a plurality of users. The overall layout of a user's page will be shared among all users, however, the content of that page will differ for each user, this being dictated by a unique template program that is made by taking a generic template that only defines layout and combining the data specific to user's interests to be displayed within the layout. (*E.g.*, screenshots in paragraph 71).

76. Plaintiff has been damaged as a result of Defendant's infringing conduct. Defendant is thus liable to Plaintiff for damages in an amount that adequately compensates

Plaintiff for such Defendant's infringement of the '414 patent, *i.e.*, in an amount that by law cannot be less than would constitute a reasonable royalty for the use of the patented technology, together with interest and costs as fixed by this Court under 35 U.S.C. § 284.

77. On information and belief, Defendant has had at least constructive notice of the '414 patent by operation of law, and there are no marking requirements that have not been complied with.

VI. COUNT IV
(PATENT INFRINGEMENT OF UNITED STATES PATENT NO. 7,565,359)

78. Plaintiff incorporates the above paragraphs herein by reference.

79. On July 21, 2009, United States Patent No. 7,565,359 ("the '359 Patent") was duly and legally issued by the United States Patent and Trademark Office. The '359 Patent is titled "Dynamic Page Generator." A true and correct copy of the '359 Patent is attached hereto as Exhibit K and incorporated herein by reference.

80. Digi Portal is the assignee of all right, title and interest in the '359 patent, including all rights to enforce and prosecute actions for infringement and to collect damages for all relevant times against infringers of the '359 Patent. Accordingly, Digi Portal possesses the exclusive right and standing to prosecute the present action for infringement of the '359 Patent by Defendant.

81. The application leading to the '359 patent was filed January 22, 2007, as a continuation of application no. 09/393,718, which issued as the '414 patent, which was a continuation of application no. 08/873,975, which issued as the '227 patent. (Ex. K at cover). The '359 patent was first assigned to Yahoo! Inc. (*Id.*).

82. The invention in the ‘359 Patent relates to the field of customized information presentation on the web; more specifically, providing customized pages that are quickly served and scalable to handle many users simultaneously. (*Id.* at col. 1:22-27).

83. The ‘359 Patent shares the identical specification as the ‘854 patent and therefore Digi Portal incorporates the background and discussion of the invention in Paragraphs 13-25. Furthermore, the prosecution history of the ‘359 patent highlights advantages and the unconventional features of the claimed invention. When allowing the claims of the ‘359 patent, the examiner focused on the last two limitations of the claim stating that executing the template program specific to the user using the real-time information stored in the shared local storage device to generate a customized page; and receiving user preferences for the user, and combining the user preferences with a generic template to form the template specific to the user, wherein the user preferences indicate the items of interest to the user in conjunction with the other limitations was not found in the prior art. (Ex. L at 8).

84. **Direct Infringement.** Upon information and belief, Defendant has been directly infringing at least claim 10 of the ‘359 patent in Delaware, and elsewhere in the United States, by performing actions comprising making and/or using the claimed computer-readable medium comprising instructions for generating customized pages that are customized according to user preferences that performs the method steps required by the claim, including without limitation through the method implemented of providing a user’s Trulia.com page (“Accused Instrumentality”). The Accused Instrumentality utilizes a computer-readable medium comprising instructions (*e.g.*, code that is executed to create webpages) for generating customized pages (*e.g.*, user-specific web pages), wherein the customized pages are customized

according to user preferences (*e.g.*, web pages will be customized to show property listings near a user's location, advertisements targeted to a user's interest, etc.).

85. On information and belief, the Accused Instrumentality performs the step of storing the real-time information in a shared local storage device (*e.g.*, property listings and advertisements will be pulled from a storage server/database and sent to a Trulia.com local web/API server for processing and display). On information and belief, the Accused Instrumentality also performs the step of storing a user-specific template program (*e.g.*, instructions and data used to generate a custom user webpage) for a plurality of users, wherein each template program indicates items of interest to a user (*e.g.*, each user's template program will include instructions, code, etc. that dictates the information that should be displayed for a user based on their interest), and is associated with a user identifier (*e.g.*, in order for a user to see information specific to them and their account, such as recent searches, the template program for their webpage must be tied to their login credentials), wherein the user identifier is associated with a user request (*e.g.*, user login and subsequent search request, navigation, etc.) for a customized page.

86. For example, after a user logs in, Trulia.com displays a user's saved listings, and therefore a user-specific template program utilized to create the displayed websites that show a user's saved listings must be tied to a user's log in information/account.

[Saved Homes](#)
[Saved Rentals](#)
[Display of Saved Searches](#)

\$400,000
3 bd - 1 ba - 1186 sqft - Condo
1065 Vermont St #8D
Brooklyn, NY, East New York
[View Details](#)

\$599,000
3 bd - 3 ba - 1442 sqft - Single-Family Home
18530 Ilion Ave
Jamaica, NY, Hollis
[View Details](#)

\$450,000
2 bd - 2 ba - 1250 sqft - Coop
100 W 57th St #8N
New York, NY, Midtown
[View Details](#)

(<https://www.trulia.com/account/properties> (for a particular user)).

87. For example, a user can also customize their Trulia.com page by selecting their saved Property related deals (Buy/Rent/Mortgage), so that selected Property related deals (Buy/Rent/Mortgage) can be displayed. In order to display the saved property of interest to a user following their login, Trulia.com must tie the template programs to a user's account.

First User:

[Any Price](#)
[All Beds](#)
[All Home Types](#)
[All For Sale](#)
[Keywords](#)
[More](#)
[Save Search](#)

\$180,000
3bd 3ba 1,321 sqft
11630 200th St
St. Albans, Jamaica, NY

\$450,000
2bd 2ba 1,250 sqft
100 W 57th St #8N
Midtown, New York, NY

\$295,000
4,645 sqft
21 Barbey St #1
East New York, Brooklyn, NY

\$199,999
3bd 1ba 800 sqft
12 Edgewater Park #12A
Thronas Neck, Bronx, NY

\$599,000
3bd 3ba 1,442 sqft
18530 Ilion Ave
Hollie, Jamaica, NY


\$400,000
3bd 1ba 1,186 sqft
1065 Vermont St #8D
East New York, Brooklyn, NY

25576 Homes Found, [Remove Map Boundary](#) [Satellite](#)

(https://www.trulia.com/NY/New_York/ (for a particular user)).

Display of Saved Searches

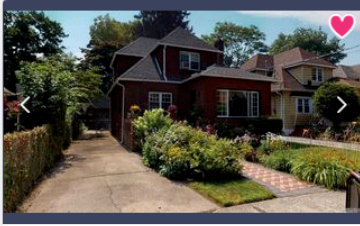
Saved Homes Saved Rentals



\$400,000

3 bd - 1 ba - 1186 sqft - Condo
1065 Vermont St #8D
Brooklyn, NY, East New York


[View Details](#)



\$599,000

3 bd - 3 ba - 1442 sqft - Single-Family Home
18530 Ilion Ave
Jamaica, NY, Hollis

[View Details](#)



\$450,000

2 bd - 2 ba - 1250 sqft - Coop
100 W 57th St #8N
New York, NY, Midtown


[View Details](#)

OPEN Wed Aug 14 5pm to 6:30pm

(<https://www.trulia.com/account/properties> (for a particular user)).

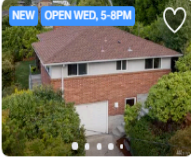
Second User:

Any Price ▾ All Beds ▾ All Home Types ▾ All For Sale ▾ Keywords ▾ More ▾ Saved Search



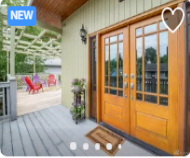
\$397,777

4bd 2ba 1,370 sqft
524 S Director St
South Park, Seattle, WA



\$719,500


3bd 3ba 2,040 sqft
4159 Cascadia Ave S
Mt. Baker, Seattle, WA



\$725,000

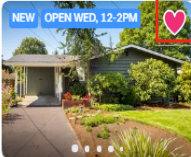
6bd 2ba 2,680 sqft
2807 NE 105th St
Meadowbrook, Seattle, WA

Selecting Saved Searches




\$300,000

3bd 1ba 1,660 sqft
13636 4th Ave NE
Haller Lake, Seattle, WA



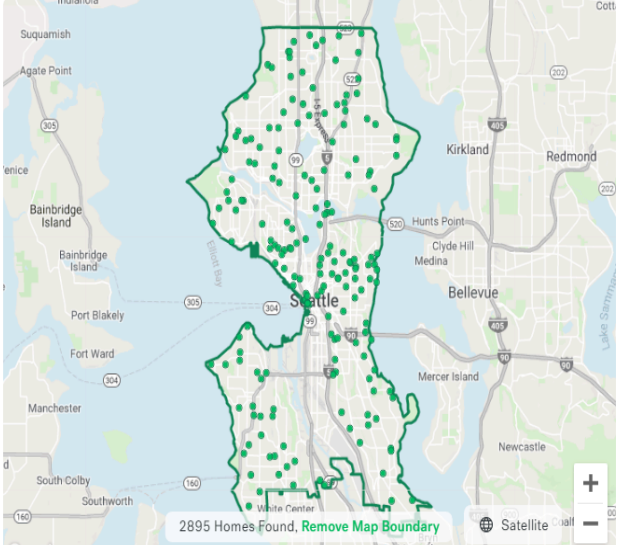
\$649,950

3bd 2ba 1,520 sqft
12041 10th Ave NW
Broadview, Seattle, WA



\$349,950

2bd 2ba 888 sqft
11550 Stone Ave N #302
Haller Lake, Seattle, WA




2895 Homes Found, [Remove Map Boundary](#)

(<https://www.trulia.com/WA/Seattle/> (for a particular user)).

Saved Homes

Saved Rentals


Display of Saved Searches



\$649,950

3 bd - 2 ba - 1520 sqft - Single-Family Home
12041 10th Ave NW
Seattle, WA, Broadview


View Details



\$349,950

2 bd - 2 ba - 888 sqft - Condo
11550 Stone Ave N #302
Seattle, WA, Haller Lake

View Details



\$397,777

4 bd - 2 ba - 1370 sqft - Single-Family Home
524 S Director St
Seattle, WA, South Park

View Details

(<https://www.trulia.com/account/properties> (for a particular user)).

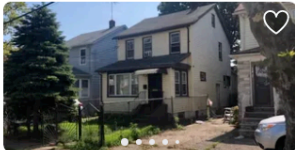
88. For example, a user’s Trulia.com page will be customized to display current property related deals (Buy/Rent/Mortgage) near their location.

First User:

Any Price ▾ All Beds ▾ All Home Types ▾ All For Sale ▾ Keywords ▾ More ▾ Save Search

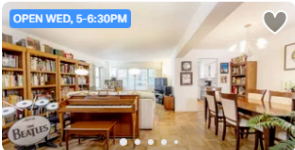
New York, NY Homes For Sale & Real Estate

25,577 homes available on Trulia



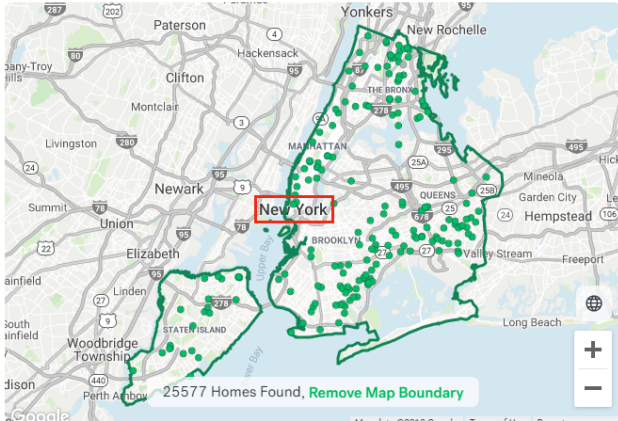
\$180,000

3bd 3ba 1,321 sqft
11630 200th St
St. Albans, Jamaica, NY



\$450,000

2bd 2ba 1,250 sqft
100 W 57th St #8N
Midtown, New York, NY



(https://www.trulia.com/NY/New_York/ (for a particular user)).

56

Second User:

Any Price ▾ All Beds ▾ All Home Types ▾ All For Sale ▾ Keywords ▾ More ▾ Save Search

Seattle, WA Homes For Sale & Real Estate

2,895 homes available on Trulia

Just For You ▾

NEW CONSTRUCTION

\$10,800,000
4bd 5ba 6,114 sqft
438 39th Ave E
Madison Park, Seattle, WA

\$125,000
1bd 1ba 142 sqft
3304 Fuhrman Ave E #6
Portage Bay, Seattle, WA

2895 Homes Found, Remove Map Boundary

(<https://www.trulia.com/WA/Seattle/> (for a particular user)).

89. For example, the JavaScript code below was retrieved from browser developer tools. Based on user data, the code is managing various Trulia.com data based on user preferences such as location.

```
{onCloseCallbackFunc:u.PropTypes.func.isRequired,properties:u.PropTypes.array.isRequired,trackingHandler:u.PropTypes.object.isRequired,trackingData:u.PropTypes.object,confirmationMessage:u.PropTypes.string,openInNewTab:u.PropTypes.bool},t.default=),function(e,n,r){use strict;function i(e){return e&&e.__esModule?e:{default:e}}function a(e,t){if(!(e instanceof t))throw new TypeError("Cannot call a class as a function")}function o(e,t){if(!e)throw new ReferenceError("this hasn't been initialised - super() hasn't been called");return t["object"]!=typeof t&&"function"!=typeof t?t:function s(e,t){if("function"!=typeof t&&null!=t)throw new TypeError("Super expression must either be null or a function, not "+typeof t);e.prototype=Object.create(t&&t.prototype,{constructor:{value:e,enumerable:!1,writable:!0,configurable:!0}}),t&&(Object.setPrototypeOf?Object.setPrototypeOf(e,t):e.__proto__=t)}Object.defineProperty(n,"__esModule",{value:!0});var u=function(){function e(t){for(var n=0;n<t.length;n++){var r=t[n];r.enumerable=r.enumerable||!1,r.configurable=!0,"value"in r&&(r.writable=!0),Object.defineProperty(e,r.key,r)}}return function(t,n,r){return n&&(t.prototype=n),r&&(t,r),t}}(),l=r(0),c=i(1),d=r(2),f=r(1),p=i(3),h=r(3),m=i(4),_r(4),y=function(e){function n(e){a(this,n);var t=o(this,n.__proto__||Object.getPrototypeOf(n)).call(this,e);return t.toggleModal(!1,e),0,_r.checkTrackingProps)(t.props),t.state={fetching:!0,properties:"",isModalOpen:!0},t)return s(n,e),u(n,{key:"fetchProperties",value:function e(n){var r=this,i=n,a=t("i")+"?pid="+this.props.propertyId+"&email="+this.props.email,[method:"GET",credentials:"include",mode:"cors"]},then(function(e){return e.json()}),then(function(e){this.fetchProperties(this.props.recommendedPropertiesUrl),this.props.trackingHandler.trackState({siteSection:"rent",pageType:"overlay",pageDetails:"recommended properties",userLoginStatus:"logged in"}))},{key:"toggleModal",value:function e(t){var n=arguments.length>1&&void 0!==arguments[1]?arguments[1]:function(){};this.setState({isModalOpen:t}),{key:"render",value:function e(){var t={height:"491px"};return c.default.createElement("div",null,this.state.fetching?c.default.createElement(d.Modal,{isOpen:this.state.isModalOpen,onCloseClick:this.onCloseCallback,c.default.createElement("div",{style:t},c.default.createElement("i",{className:"centerVertical iconSpinner centerHorizontalFluidWidth"}))),c.default.createElement(d.Modal,{isOpen:this.state.isModalOpen,onCloseClick:this.onCloseCallback,c.default.createElement("div",{className:"RecommendedProperties backgroundBasic fef"}),c.default.createElement(n.default,{onCloseCallbackFunc:this.onCloseCallback,trackingHandler:this.props.trackingHandler}),c.default.createElement(p.default,{properties:this.state.properties,confirmationMessage:this.props.confirmationMessage,trackingHandler:this.props.trackingHandler,openInNewTab:this.props.openInNewTab}}))}}),n}(l.Component);y.propTypes={onCloseCallbackFunc:l.PropTypes.func.isRequired,trackingHandler:l.PropTypes.object.isRequired,confirmationMessage:l.PropTypes.string,propertyId:l.PropTypes.string,email:l.PropTypes.str
```

(<https://static.trulia->

cdn.com/javascript/140a0b7/include/js/built/combo/site_js_new.31d1be8686c06ab56722.js (for a particular user)).

```
{site root:"/",recaptchaKey:"6Ld6hB0TAAAAAIKpx6nUyypugc0VR142c19gaq8", fb app id:"183577541666001", fb permissions:"email,user location"}},function(e,t){e.exports=function(e){function t(r){if(n[r])return n[r].exports;var i=n[r]={exports:{},id:r,loaded:!1};return e[r].call(i.exports,i.exports,t,i.loaded=!0,i.exports)var n={};return t.m=e,t.c=n,t.p="",t(0)}(function(e,t,n){function r(e){return e&&e._esModule?e:{default:e};Object.defineProperty(t,"_esModule",{value:!0}),t.GoogleAnalyticsTracking=t.FacebookAnalyticsTracking=void 0;var i=n(1),a=r(i),o=n(3),s=r(o);t.FacebookAnalyticsTracking=s.default,t.GoogleAnalyticsTracking=s.default},function(e,t,n){function r(e){return e&&e._esModule?e:{default:e};function i(e,t){if(!e instanceof t)throw new TypeError("Cannot call a class as a function");function a(e,t){if(!e)throw new ReferenceError("this hasn't been initialised - super() hasn't been called");return t}!t||"object"!=typeof t&&"function"!=typeof t?t:t=function o(e,t){if("function"!=typeof t&&null!=t)throw new TypeError("Super expression must either be null or a function, not "+typeof t);o.prototype=Object.create(t&&t.prototype,{constructor:{value:e,enumerable:!1,writable:!0,configurable:!0}}),t&&(Object.setPrototypeOf?Object.setPrototypeOf(e,t):e.__proto__=t)}Object.defineProperty(t,"_esModule",{value:!0});var s=function(){function e(t){for(var n=0;n<t.length;n++){var
```

(Id. (for a particular user)).

```
{}:trulia.errors,trulia.errors.DEFAULT_ERROR_MESSAGE="Sorry -- an error occurred",trulia.errors.AUTH_MUST_LOG_IN=-2,trulia.errors.ERROR_API_RESPONSE=-3,window._v=null,window._num_friend_emails=1,window.QA_ERROR_LABELS={profanity:"No profanity - please!",question_missing:"Please enter a question.",question_too_short:"Sorry, your question is too short. A minimum of 15 characters is needed.",question_too_long:"Sorry, your question is too long. Questions cannot be longer than 150 characters.",body_too_short:"Sorry, your question is too short. A minimum of 5 characters is needed.",body_too_long:"Sorry, your question is too long. Questions cannot be longer than 1000 characters.",location:"No location match found for city & state, or ZIP.",no_location:"Please enter a location.",category:"Please select a category.",captcha:"Please enter the correct text in the input box.",no_captcha:"Please enter the correct text in the input box.",default_error:trulia.errors.DEFAULT_ERROR_MESSAGE,not_allowed:"Sorry -- you are not allowed to perform this operation.",bad_friend_email:"Please enter a valid email address",error_summary:<span class="error-title"><strong>Sorry</strong> There were errors. Please see below for details.</span>'},window._STATES={AL:"Alabama",AK:"Alaska",AZ:"Arizona",AR:"Arkansas",CA:"California",CO:"Colorado",CT:"Connecticut",DE:"Delaware",DC:"District Of Columbia",FL:"Florida",GA:"Georgia",HI:"Hawaii",ID:"Idaho",IL:"Illinois",IN:"Indiana",IA:"Iowa",KS:"Kansas",KY:"Kentucky",LA:"Louisiana",ME:"Maine",MD:"Maryland",MA:"Massachusetts",MI:"Michigan",MN:"Minnesota",MS:"Mississippi",MO:"Missouri",MT:"Montana",NE:"Nebraska",NV:"Nevada",NH:"New Hampshire",NJ:"New Jersey",NM:"New Mexico",NY:"New York",NC:"North Carolina",ND:"North Dakota",OH:"Ohio",OK:"Oklahoma",OR:"Oregon",PA:"Pennsylvania",RI:"Rhode Island",SC:"South Carolina",SD:"South Dakota",TN:"Tennessee",TX:"Texas",UT:"Utah",VT:"Vermont",VA:"Virginia",WA:"Washington",WV:"West Virginia",WI:"Wisconsin",WY:"Wyoming"},"undefined"!=typeof Queue&&(window.save_queue=new Queue,window.alert_queue=new Queue),"undefined"==typeof _trulia_logged_in&&(window._trulia_logged_in=0),"undefined"==typeof _is_real_estate_pro&&(window._is_real_estate_pro=0),"undefined"==typeof _supports_my_trulia&&(window._supports_my_trulia=0),,,,,,,,,function(e,t){trulia=trulia||{}}),trulia.PixelTracking=function(){var e=
```

(Id. (for a particular user)).

90. On information and belief, the Accused Instrumentality performs the step of receiving a template program (e.g., code, instructions, etc. that are executed to create a user page) specific to the user using the user identifier (e.g., as explained above, in order to display pages customized for a user subsequent to their login, the template program used to create the customized page must be tied to the user's account credentials), wherein the template program is received from one of at least two locations (e.g., main storage at a Trulia.com server or local device storage), the location based upon a frequency of user requests for the customized page. On information and belief, template information that is part of the template program is stored for less frequently accessed files in a main storage server wherein frequently accessed files will be stored in local storage on the user's computer. On information and belief, when a user signs-up or performs a login, the code takes the user template information and stores it in a site Javascript object that is used in logic to display various available property related deals (Buy/Rent/Mortgage), and other site logic-based conditions. The template information can be stored in multiple locations including but not limited to (1) at runtime, in a Javascript object with the data structure called ContextData; (2) within browser local storage; and (3) browser cookies.

91. On information and belief, the Accused Instrumentality performs that step of executing the template program specific to the user (*e.g.*, generating user-specific web page by executing a template program which is composed of code, instructions, and data) using the real-time information stored in the shared local storage device (*e.g.*, property listings and advertisements pulled from external storage servers/databases and sent to a local Trulia.com web/API server for processing and display) to generate the customized page. As shown above, a user's Trulia.com page will be customized to show current property related deals (Buy/Rent/Mortgage) near the location linked to a user's account.

92. On information and belief, the Accused Instrumentality performs the step of receiving user preferences for the user (*e.g.*, user location, past/saved properties, user interest/habits, etc.), and for combining the user preferences with a generic template to form the template program specific to the user (*e.g.*, user-specific web page), wherein the user preferences indicate the items of interest to the user. On information and belief, the Accused Instrumentality uses a template program that is unique to the user to generate a customized webpage by combining customization information unique to the user and a global template that is generic to a plurality of users. The overall layout of a user's page will be shared among all users; however, the content of that page will differ for each user, this being dictated by a unique template program that is made by taking a general template that only defines layout and adding the data to be displayed within the layout. For example, the following screenshots of two different users that have varying current property related deals (Buy/Rent/Mortgage) displayed based upon the users' respective locations (*i.e.*, real-time information selected for the user's customized web page based on the customization information unique to the user such as current property related deals (Buy/Rent/Mortgage)) shows that the template program is varied so that each user can

receive appropriately customized pages (e.g., the code for each respective page is updated/adapted to pull from different resources so that the appropriate information/data can be referenced/displayed for each user).

First User:

Any Price ▾ All Beds ▾ All Home Types ▾ All For Sale ▾ Keywords ▾ More ▾ **Save Search**

\$180,000
3bd 3ba 1,321 sqft
11630 200th St
St. Albans, Jamaica, NY

\$450,000
2bd 2ba 1,250 sqft
100 W 57th St #8N
Midtown, New York, NY

\$295,000
4,645 sqft
21 Barbey St #1
East New York, Brooklyn, NY

\$199,999
3bd 1ba 800 sqft
12 Edgewater Park #12A
Throne Neck, Bronx, NY

\$599,000
3bd 3ba 1,442 sqft
18530 Ilion Ave
Hollie, Jamaica, NY

\$400,000
3bd 1ba 1,186 sqft
1065 Vermont St #8D
East New York, Brooklyn, NY

25576 Homes Found, Remove Map Boundary

(https://www.trulia.com/NY/New_York/ (for a particular user)).

Second User:

Any Price ▾ All Beds ▾ All Home Types ▾ All For Sale ▾ Keywords ▾ More ▾ **Saved Search**

\$397,777
4bd 2ba 1,370 sqft
524 S Director St
South Park, Seattle, WA

\$719,500
3bd 3ba 2,040 sqft
4159 Cascadia Ave S
Mt. Baker, Seattle, WA

\$725,000
6bd 2ba 2,680 sqft
2807 NE 105th St
Meadowbrook, Seattle, WA

\$300,000
3bd 1ba 1,660 sqft
13636 4th Ave NE
Haller Lake, Seattle, WA

\$649,950
3bd 2ba 1,520 sqft
12041 10th Ave NW
Broadview, Seattle, WA

\$349,950
2bd 2ba 888 sqft
11550 Stone Ave N #302
Haller Lake, Seattle, WA

2895 Homes Found, Remove Map Boundary

(<https://www.trulia.com/WA/Seattle/> (for a particular user)).

93. Plaintiff has been damaged as a result of Defendant's infringing conduct. Defendant is thus liable to Plaintiff for damages in an amount that adequately compensates Plaintiff for such Defendant's infringement of the '359 patent, *i.e.*, in an amount that by law cannot be less than would constitute a reasonable royalty for the use of the patented technology, together with interest and costs as fixed by this Court under 35 U.S.C. § 284.

94. On information and belief, Defendant has had at least constructive notice of the '359 patent by operation of law, and there are no marking requirements that have not been complied with.

VII. COUNT V
(PATENT INFRINGEMENT OF UNITED STATES PATENT NO. 9,626,342)

95. Plaintiff incorporates the above paragraphs herein by reference.

96. On April 18, 2017, United States Patent No. 9,626,342 ("the '342 Patent") was duly and legally issued by the United States Patent and Trademark Office. The '342 Patent is titled "Dynamic Page Generator." The '342 patent is not subject to a terminal disclaimer and its term is extended under 35 U.S.C. 154(b) by 891 days. (Ex. M). A true and correct copy of the '342 Patent is attached hereto as Exhibit M and incorporated herein by reference.

97. Digi Portal is the assignee of all right, title and interest in the '342 patent, including all rights to enforce and prosecute actions for infringement and to collect damages for all relevant times against infringers of the '342 Patent. Accordingly, Digi Portal possesses the exclusive right and standing to prosecute the present action for infringement of the '342 Patent by Defendant.

98. The application leading to the '342 patent was filed December 21, 2012, as a continuation of application no. 11/842,095, which was a continuation of application no.

11/656,636, which is a continuation of 09/393,718, which was a continuation of application no. 08/873,975, which issued as the '227 patent. (Ex. M at cover).

99. The invention in the '342 Patent relates to the field of customized information presentation on the web; more specifically, providing customized pages that are quickly served and scalable to handle many users simultaneously. (*Id.* at col. 1:33-37).

100. The '342 Patent shares the identical specification as the '854 patent and therefore Digi Portal incorporates the background and discussion of the invention in Paragraphs 13-25.

101. **Direct Infringement.** Upon information and belief, Defendant has been directly infringing at least claims 1 and 7 of the '342 patent in Delaware, and elsewhere in the United States, by performing actions comprising performing the claimed method steps, including without limitation through the method implemented of providing a user's Trulia.com page ("Accused Instrumentality"). The Accused Instrumentality practices the method of responding to a user request (*e.g.*, a user login request, search initiation, etc.) for a customized page (*e.g.*, a user's customized home and search pages on the Trulia.com website). (*E.g.*, <https://www.trulia.com/>).

102. On information and belief, the Accused Instrumentality performs the step of generating, via at least one server computer (*e.g.*, Trulia.com server), a template program unique to the user (*e.g.*, a template program will be unique to a user because it is composed of instruction, code, and data that is processed/executed to create a webpage customized to a user), the template program that is unique to the user being used to form the user's customized web page, the template program that is unique to the user being generated using customization information unique to the user (*e.g.*, user location, past/saved properties, user interest/habits) and a global template that is generic to a plurality of users. On information and belief, the Accused

Instrumentality uses a template program that is unique to the user to generate a customized webpage by combining customization information unique to the user and a global template that is generic to a plurality of users. The overall layout of a user's page will be shared among all users; however, the content of that page will differ for each user, this being dictated by a unique template program that is made by taking a general template that only defines layout and combining the data selected based on customization information unique to the user to be displayed within the layout. For example, the following screenshots for two different users have varying current property related deals (Buy/Rent/Mortgage) displayed based upon the users' respective locations (*i.e.*, real-time information selected for the user's customized web page based on the customization information unique to the user such as current property related deals (Buy/Rent/Mortgage) near a particular location).

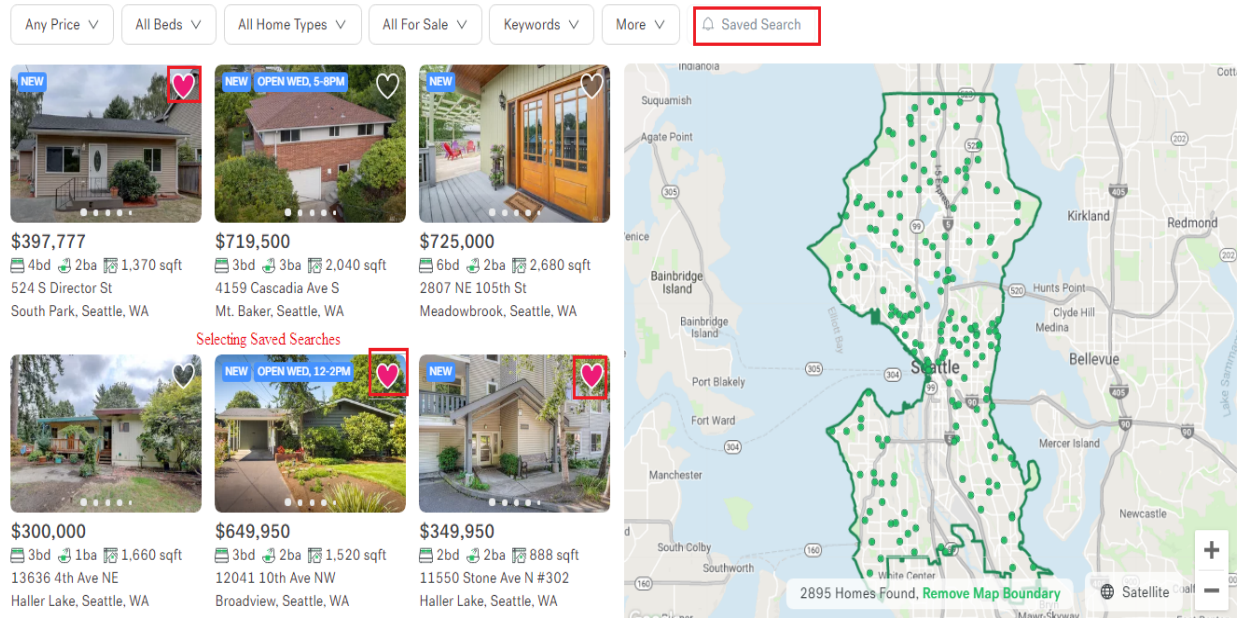
First User:

The screenshot displays the Trulia website interface for New York. At the top, there are filter buttons: "Any Price", "All Beds", "All Home Types", "All For Sale", "Keywords", "More", and a "Save Search" button highlighted with a red box. Below the filters, there are six property listings arranged in two rows of three. Each listing includes a photo, price, and basic details. The first row shows properties for \$180,000, \$450,000, and \$295,000. The second row shows properties for \$199,999, \$599,000, and \$400,000. A red box highlights the "Selecting saved searches" text below the first row. To the right of the listings is a map of New York with a green boundary indicating the search area. The map shows various neighborhoods and is labeled with "25576 Homes Found, Remove Map Boundary".

| Price | Bedrooms | Bathrooms | Sqft | Address | Location |
|-----------|----------|------------|-----------------|-----------------------------|-----------------------------|
| \$180,000 | 3bd | 3ba | 1,321 sqft | 11630 200th St | St. Albans, Jamaica, NY |
| \$450,000 | 2bd | 2ba | 1,250 sqft | 100 W 57th St #8N | Midtown, New York, NY |
| \$295,000 | 4 | 4,645 sqft | 21 Barbey St #1 | East New York, Brooklyn, NY | |
| \$199,999 | 3bd | 1ba | 800 sqft | 12 Edgewater Park #12A | Throne Neck, Bronx, NY |
| \$599,000 | 3bd | 3ba | 1,442 sqft | 18530 Ilion Ave | Hollie, Jamaica, NY |
| \$400,000 | 3bd | 1ba | 1,186 sqft | 1065 Vermont St #8D | East New York, Brooklyn, NY |

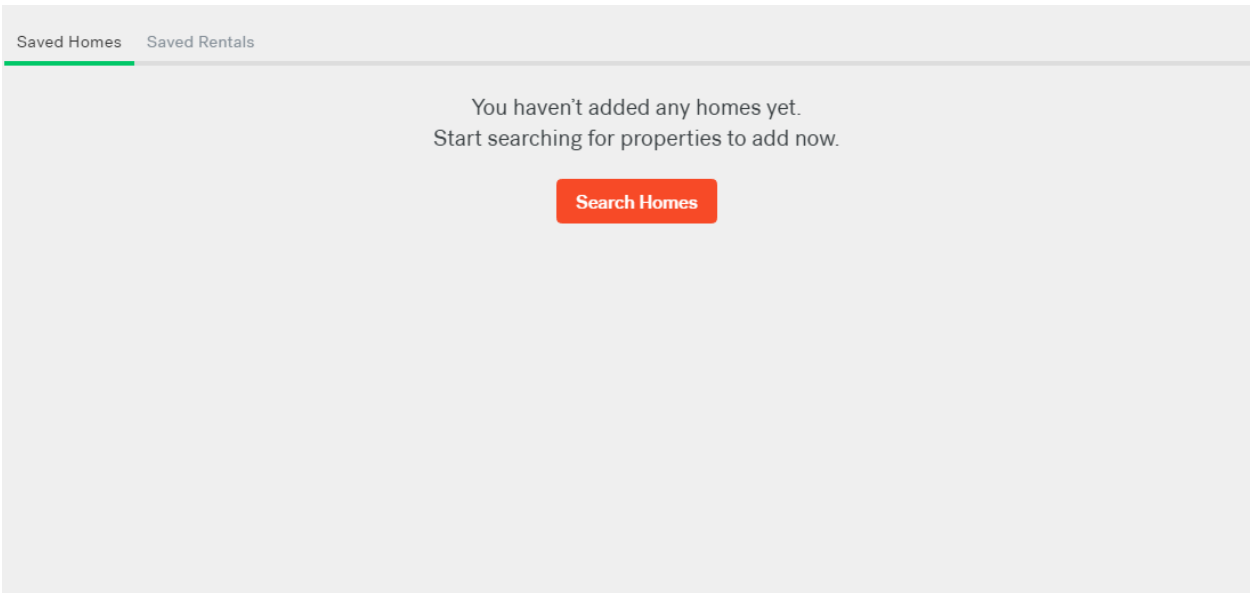
(https://www.trulia.com/NY/New_York/ (for a particular user)).

Second User:



(<https://www.trulia.com/WA/Seattle/> (for a particular user)).

103. For example, a user can also customize their Trulia.com page by selecting their saved Property related deals (Buy/Rent/Mortgage), so that selected Property related deals (Buy/Rent/Mortgage) can be displayed.



(<https://www.trulia.com/account/properties> (for a particular user)).

First User:

Any Price ▾

All Beds ▾


All Home Types ▾

All For Sale ▾

Keywords ▾

More ▾

Save Search



♥

OPEN WED, 5-6:30PM


NEW

\$180,000

3bd 3ba 1,321 sqft

11630 200th St

St. Albans, Jamaica, NY



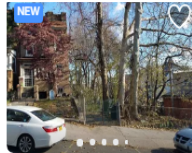
♥

\$450,000

2bd 2ba 1,250 sqft

100 W 57th St #8N

Midtown, New York, NY




♥

\$295,000

4,645 sqft

21 Barbey St #1

East New York, Brooklyn, NY



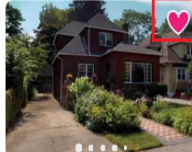
♥

\$199,999

3bd 1ba 800 sqft

12 Edgewater Park #12A

Throne Neck, Bronx, NY



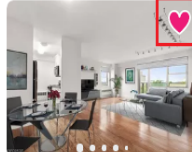
♥

\$599,000

3bd 3ba 1,442 sqft

18530 Ilion Ave

Hollis, Jamaica, NY



♥

\$400,000

3bd 1ba 1,186 sqft

1065 Vermont St #8D

East New York, Brooklyn, NY

25576 Homes Found, Remove Map Boundary


Satellite

(https://www.trulia.com/NY/New_York/ (for a particular user)).

Saved Homes

Saved Rentals

Display of Saved Searches



♥


\$400,000

3 bd - 1 ba - 1186 sqft - Condo

1065 Vermont St #8D

Brooklyn, NY, East New York

View Details



♥


\$599,000

3 bd - 3 ba - 1442 sqft - Single-Family Home

18530 Ilion Ave

Jamaica, NY, Hollis

View Details



♥

OPEN Wed Aug 14 5pm to 6:30pm

\$450,000

2 bd - 2 ba - 1250 sqft - Coop

100 W 57th St #8N

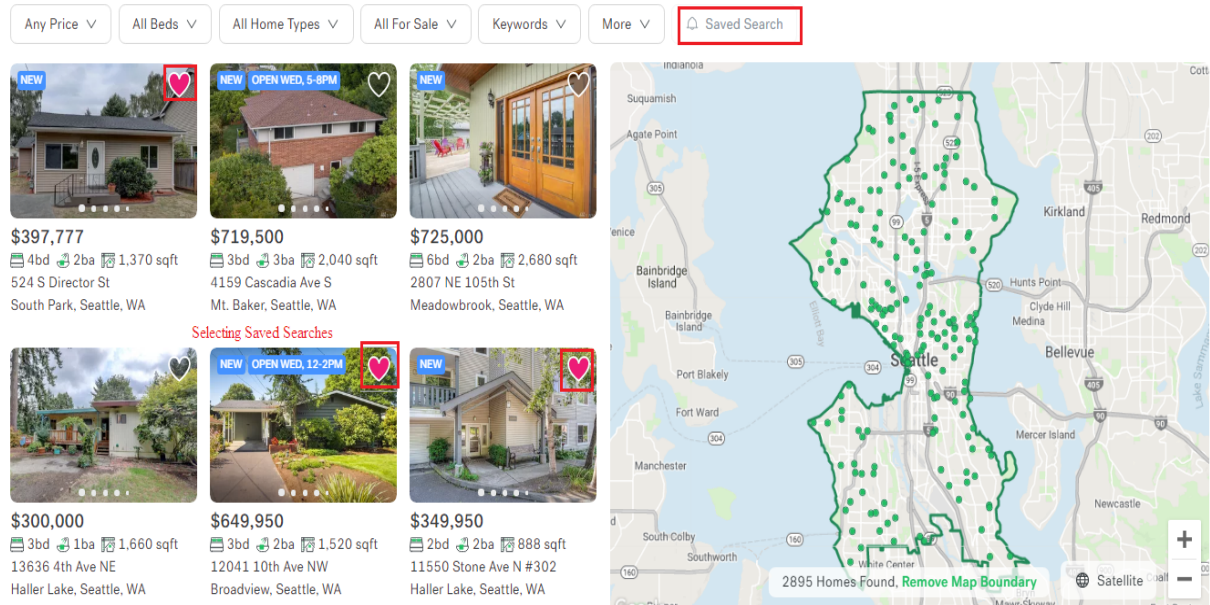
New York, NY, Midtown

View Details

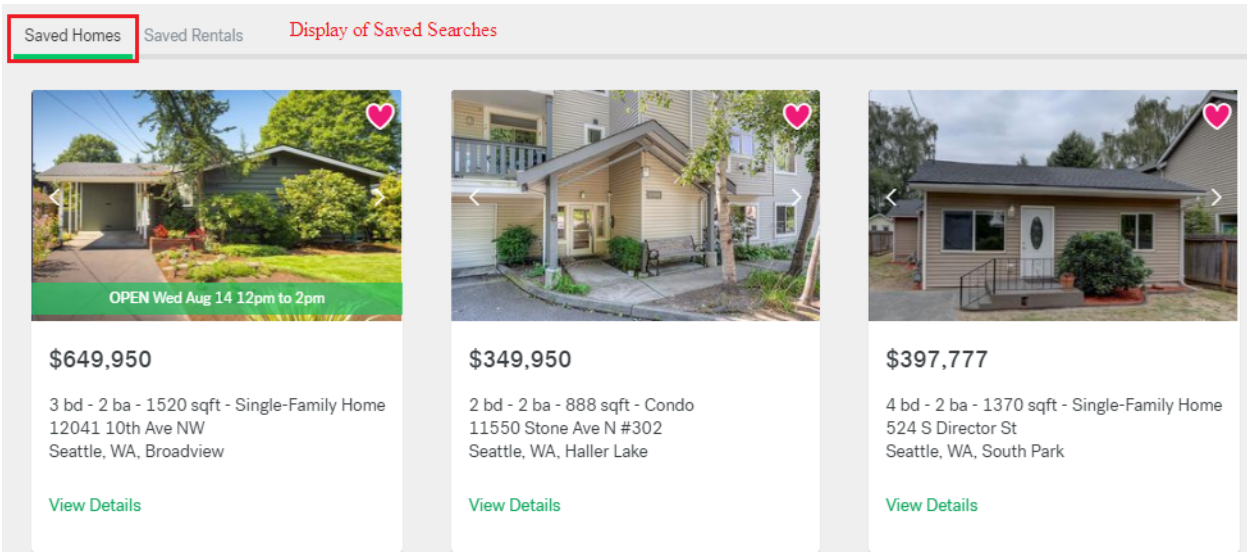
(<https://www.trulia.com/account/properties> (for a particular user)).

65

Second User:



(<https://www.trulia.com/WA/Seattle/> (for a particular user)).



(<https://www.trulia.com/account/properties> (for a particular user)).

104. On information and belief, the Accused Instrumentality performs the step of executing, via the at least one server computer (e.g., Trulia.com server), the user's template program (e.g., instructions, code and data used to create a user webpage) to generate the user's customized web page, the user's customized web page including real-time information (e.g.,

current property related deals (Buy/Rent/Mortgage), advertisements) selected for the user's customized web page based on the customization information unique to the user (e.g., user location, saved property). For example, a user's Trulia.com page will be customized to show current property related deals (Buy/Rent/Mortgage) near the location linked to a user's account.

First User:

New York, NY Homes For Sale & Real Estate
25,577 homes available on Trulia

Just For You

\$180,000
3bd 3ba 1,321 sqft
11630 200th St
St. Albans, Jamaica, NY

\$450,000
2bd 2ba 1,250 sqft
100 W 57th St #8N
Midtown, New York, NY

25,577 Homes Found, Remove Map Boundary

(https://www.trulia.com/NY/New_York/ (for a particular user)).

Second User:

Seattle, WA Homes For Sale & Real Estate
2,895 homes available on Trulia

Just For You

\$10,800,000
4bd 5ba 6,114 sqft
438 39th Ave E
Madison Park, Seattle, WA

\$125,000
1bd 1ba 142 sqft
3304 Fuhrman Ave E #6
Portage Bay, Seattle, WA

2,895 Homes Found, Remove Map Boundary

(<https://www.trulia.com/WA/Seattle/> (for a particular user)).

105. For example, a user can also customize their Trulia.com page by selecting their saved Property related deals (Buy/Rent/Mortgage), so that selected Property related deals (Buy/Rent/Mortgage) can be displayed.

First User:

Any Price ▾ All Beds ▾ All Home Types ▾ All For Sale ▾ Keywords ▾ More ▾ **Save Search**

\$180,000
3bd 3ba 1,321 sqft
11630 200th St
St. Albans, Jamaica, NY

\$450,000
2bd 2ba 1,250 sqft
100 W 57th St #8N
Midtown, New York, NY

\$295,000
4,645 sqft
21 Barbey St #1
East New York, Brooklyn, NY

\$199,999
3bd 1ba 800 sqft
12 Edgewater Park #12A
Throane Neck, Bronx, NY

\$599,000
3bd 3ba 1,442 sqft
18530 Ilion Ave
Hollic, Jamaica, NY

\$400,000
3bd 1ba 1,186 sqft
1065 Vermont St #8D
East New York, Brooklyn, NY

25576 Homes Found, [Remove Map Boundary](#) Satellite

(https://www.trulia.com/NY/New_York/ (for a particular user)).

Saved Homes Saved Rentals **Display of Saved Searches**

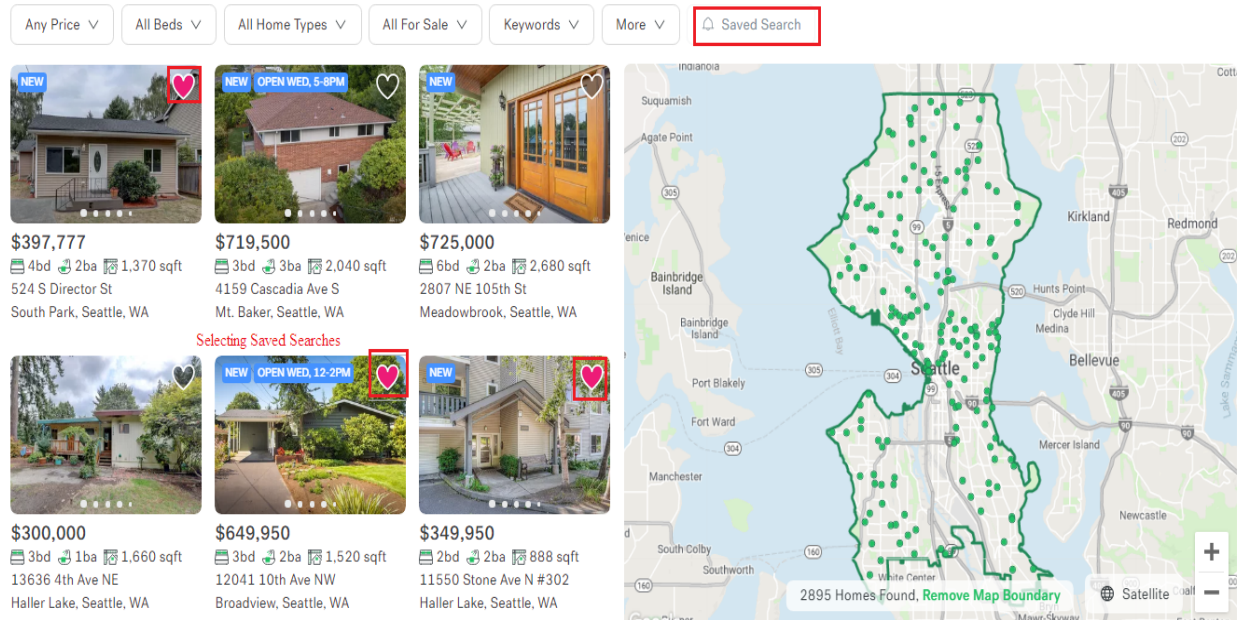
\$400,000
3 bd - 1 ba - 1186 sqft - Condo
1065 Vermont St #8D
Brooklyn, NY, East New York
[View Details](#)

\$599,000
3 bd - 3 ba - 1442 sqft - Single-Family Home
18530 Ilion Ave
Jamaica, NY, Hollic
[View Details](#)

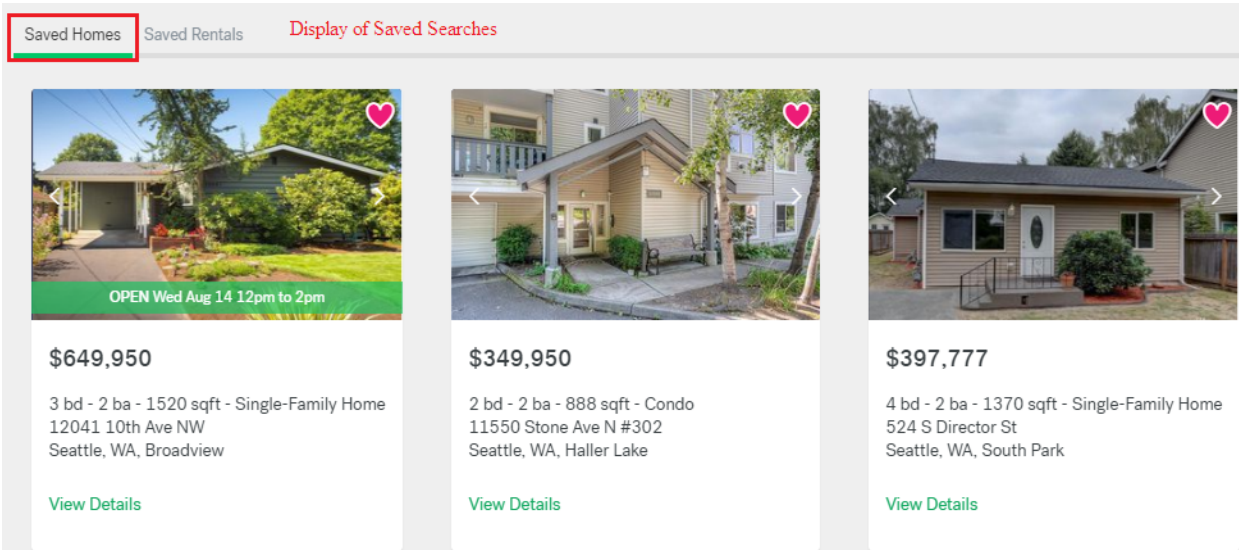
\$450,000
2 bd - 2 ba - 1250 sqft - Coop
100 W 57th St #8N
New York, NY, Midtown
[View Details](#)

(<https://www.trulia.com/account/properties> (for a particular user)).

Second User:



(<https://www.trulia.com/WA/Seattle/> (for a particular user)).



(<https://www.trulia.com/account/properties> (for a particular user)).

106. On information and belief, the Accused Instrumentality performs the step of in response to receiving a subsequent request for the user's customized web page (*e.g.*, user login); receiving, via the at least one server computer (Trulia.com server), the template program that is unique to the user from one of at least two locations (*e.g.*, main storage at a Trulia.com server or

local storage on the user's device), the location determined from the frequency of the request for the user's customized web page. On information and belief, template information that is part of the template program is stored for less frequently accessed files in a main storage wherein frequently accessed files will be stored in storage on the user's computer. Running the template program (page generation code, tiles, containers, and user data) creates the customized webpage. On information and belief, when a user signs-up or performs a login, the code takes the user template information and stores it in a site Javascript object that is used in logic to display various available property related deals (Buy/Rent/Mortgage) and other site logic-based conditions. On information and belief, the template information can be stored in multiple locations: (1) at runtime, in a Javascript object with the data structure called ContextData; (2) within browser local storage; and (3) browser cookies.

```
r.getModuleFromInstance(e);null}},Mount:a,Reconciler:o));var h,m,_y,v,g,b,w,k,M;e.exports=p},function(e,t,n){
1===e.nodeType&&e.getAttribute(m)===String(t)||8===e.nodeType&&e.nodeValue===react-text:"*t* "||8===e.nodeType&&e.nodeValue===react-empty:"*t* "})function i(e){for(var
t;e._renderedComponent;e=t)return e}function a(e,t){var n=i(e);n._hostNode=t,t[y]=n}function o(e){var t=e._hostNode;t&&(delete t[y],e._hostNode=null)}function s(e,t){if(!
(e._flags&&.hasCachedChildNodes)){var n=e._renderedChildren,o=t.firstChild;for(var s in n)if(n.hasOwnProperty(s)){var u=n[s],l=i(u),d=ID;if(0===l
for(;;null!==o;o=o.nextSibling){if((o,l))l(o,u);continue}e.d("32",l)}e._flags|=e._hasCachedChildNodes;function u(e){if(e[y])return e[y];for(var t=0;t<e[y];)
{t.push(e);e=e.parentNode;return null}e.parentNode;for(var n,r;e&&(r=e[y]);e=e.pop())n=r,t.length&>s(r,e);return n}function i(e){var t=u(e);return null!=t&&._hostNode===e
t=null}function c(e){if(void 0===e._hostNode&&("33"),e._hostNode;return e._hostNode;for(var t=0;t<e[y];)t.push(e);e._hostParent[d("34")]=e._hostParent;for(t.length>e.pop())s(e,e._hostNode);return e._hostNode}var
d=n(37),f=n(38),p=n(40),h=n(39),m=f.ID_ATTRIBUTE_NAME,_p,y=" _reactInternalInstances"*Math.random().toString(36).slice(2),v=
(getClosestInstanceFromNode:u,getInstanceFromNode:l,getNodeFromInstance:c,precacheChildNodes:s,precacheNode:a,uncacheNode:o);e.exports=v},function(e,t){
for(var t=arguments.length-1,n="Unified React error #"+t,visit=http://facebook.github.io/react/docs/error-decoder.html?
invariant="+e,r="#>";t>0;t--){n+=n="args["+n+" "+encodeURIComponent(arguments[t+1])+"]"+n+ " for the full message or use the non-minified dev environment for full errors and additional helpful
warnings.";var i=new Error(n);throw i.name="Invariant Violation",i.framesOmitPop=1,i.e.exports=n,function(e,t,n){function r(e,t){return(e&t)===t}var i=n(37),a=n(39),o=
{MUST_USE_PROPERTY:1,HAS_BOOLEAN_VALUE:4,HAS_NUMERIC_VALUE:8,HAS_POSITIVE_NUMERIC_VALUE:24,HAS_OVERLOADED_BOOLEAN_VALUE:32,injectDOMPropertyConfig:function(e){var t=o,n=e.Properties||
{},a=e.DOMAttributeNamespaces||{},s=e.DOMAttributeNames||{},l=e.DOMPropertyNames||{},c=e.DOMMutationMethods||{}}
```

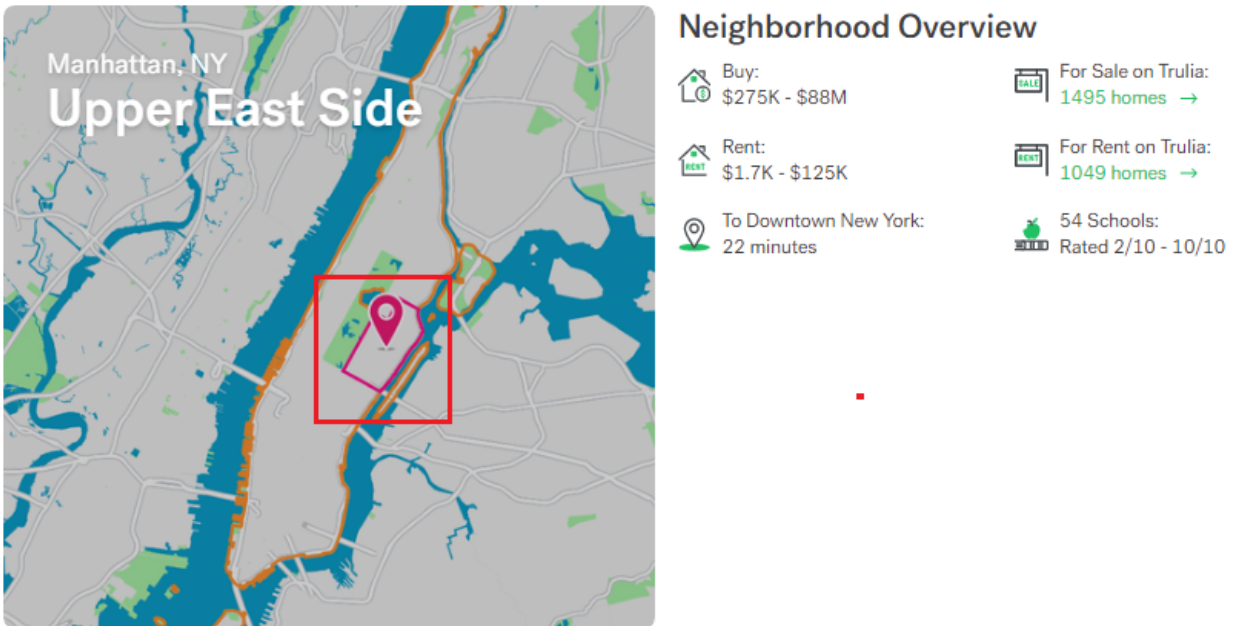
(<https://static.trulia->

cdn.com/javascript/140a0b7/include/js/_built/combo/site_js_new.31d1be8686c06ab56722.js (for a particular user)).

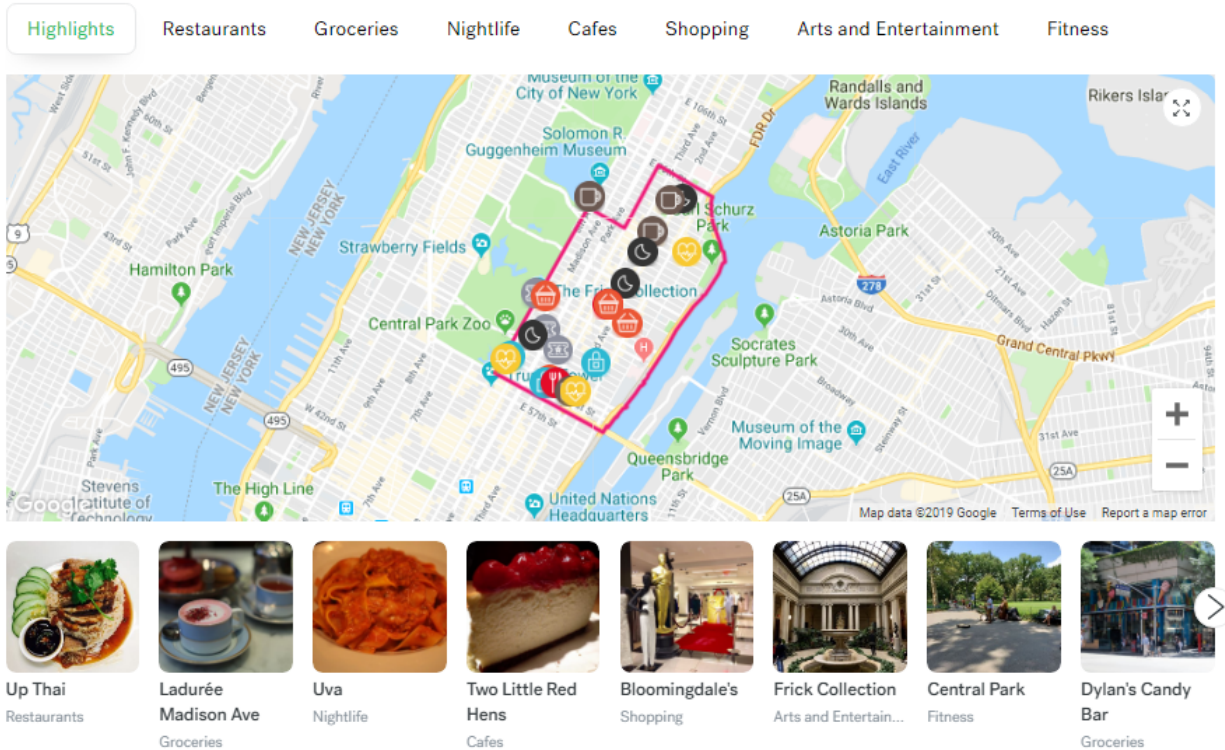
```
{z:googleyolo,t.resolve(z)},_hintYoloPromise:function e(){var t=this;return z.hint({supportedAuthMethods:["https://accounts.google.com"],supportedIdTokenProviders:
[uri:"https://accounts.google.com",clientId:t.clientId]}),cancelSingleTapSignUp:function e()
{this._setLastSeenLocalStorageToken(z.cancelLastOperation()),isGoogleOneTapSignUpEnabled:function e(){return this.isGoogleOneTapSignUpEnabled},login:function e(){var
t=$.Deferred(),n=this._loadGoogleVoloClient().then(function(t){n._hintYoloPromise().then(function(e){e&&.idToken&&.loginTruliaUser(e.idToken,t)},function(e)
{n._closeBanner(t)}),function(e){n._handleGoogleErrorTracking(t)},t.promise()),_loginTruliaUser:function e(t,n){this.save({idToken:t}).then(function(e,t,r){r.status===200
Q.triggerGoogleSingleTapSignUpNewUserLoginSuccess(e.userId),Q.triggerGoogleSingleTapSignUpExistingUserLoginSuccess(e.userId),n.resolve(e,r)).fail(function(e)
{Q.triggerGoogleSingleTapSignUpLoginError(!1),n.reject()}),_handleGoogleErrorTracking:function e(t){Q.triggerGoogleSingleTapSignUpLoginError(!0,t.reject()),_closeBanner:function e(t)
{this.cancelSingleTapSignUp(t,t.reject()),_setLastSeenLocalStorageToken:function e(){localStorage.setItem("lastSeen googleSingleTapSignUp",(new Date).getTime())},_=function(e)
function t(){return L(this,t,j(this,(t._proto||Object.getPrototypeOf(t)).apply(this,arguments)))return Y(t,e),E(t,{key:"triggerOpenModal",value:function e()
{this._initializeTrackingData(),this._triggerAnalyticsTrackState(),{key:"triggerRegisterSuccess",value:function e(t){this._initializeTrackingData(),this._setInteractedWithData("sign
in modal:native submit"),this._setLoginEndData("1"),this._setRegistrationEnd("1"),this._setTruliaUserId(t),this._triggerAnalyticsTrackAction(),{key:"triggerAgentsLink",value:function
e(){this._triggerAnalyticsInteractedWith("sign in modal:agents link"),this._triggerPageStateChange(),{key:"triggerRegisterSubmitted",value:function e()
{this._initializeTrackingData(),this._setInteractedWithData("sign in modal:native submit"),this._setLoginStartData("1"),this._triggerAnalyticsTrackAction(),
{key:"triggerRegisterFailed",value:function e(t){this._initializeTrackingData(),this._setFormErrorText("error|"+t),this._triggerAnalyticsTrackAction(),{key:"triggerAnalyticsTrackAction()
e(t){L(this,e),this._domElement=t,this._id=t.id,this._widgetId=void 0}return E(e,{key:"isRendered",value:function e(){return void
```

(Id. (for a particular user)).

107. On information and belief, the Accused Instrumentality performs the step of executing, via the at least one server computer (*e.g.*, Trulia.com server), the received template program that is unique to the user (*e.g.*, instructions, code, and data that is executed to create a customized user webpage) to generate the user's customized web page, the user's customized web page including real-time information (*e.g.*, current property related deals (Buy/Rent/Mortgage), advertisements) selected for the user's customized web page in response to the subsequent request (*e.g.*, user login, search initiation, etc.) and based on the customization information unique to the user (*e.g.*, user location, saved property, interest/habits).



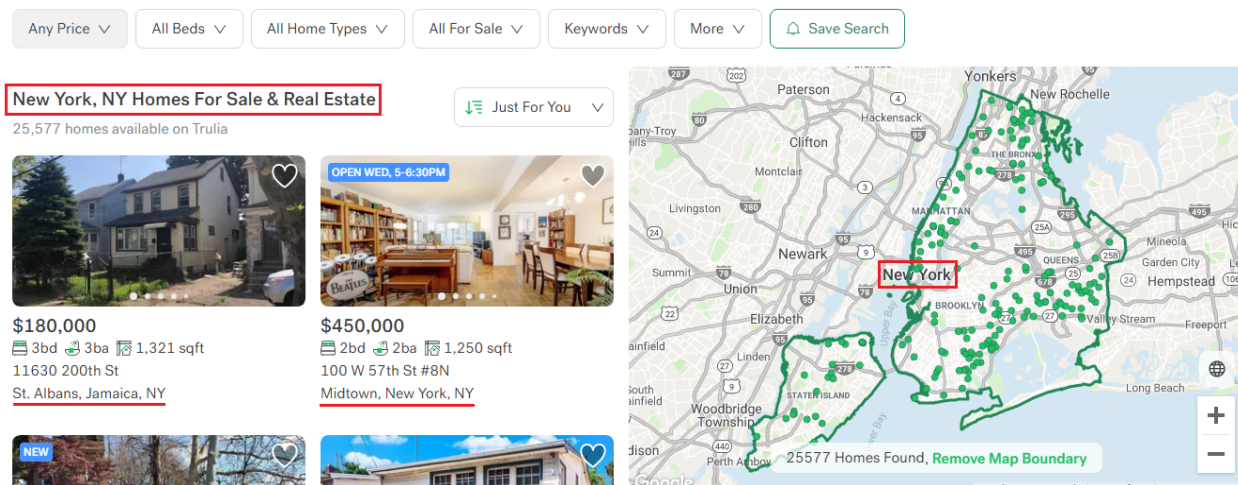
(<https://www.trulia.com/n/ny/new-york/upper-east-side/85381/> (for a particular user)).



(<https://www.trulia.com/n/ny/new-york/upper-east-side/85381/> (for a particular user)).

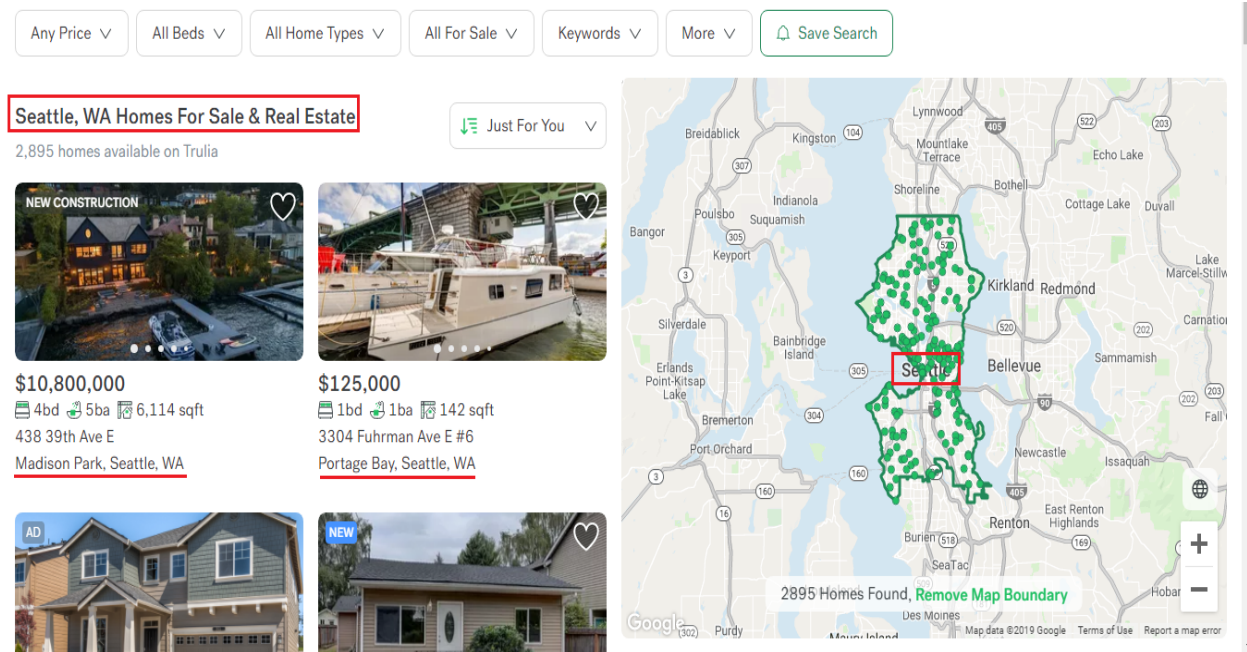
108. For example, a user's Trulia.com page will also be customized to show current property related deals (Buy/Rent/Mortgage) near the location linked to a user's account.

First User



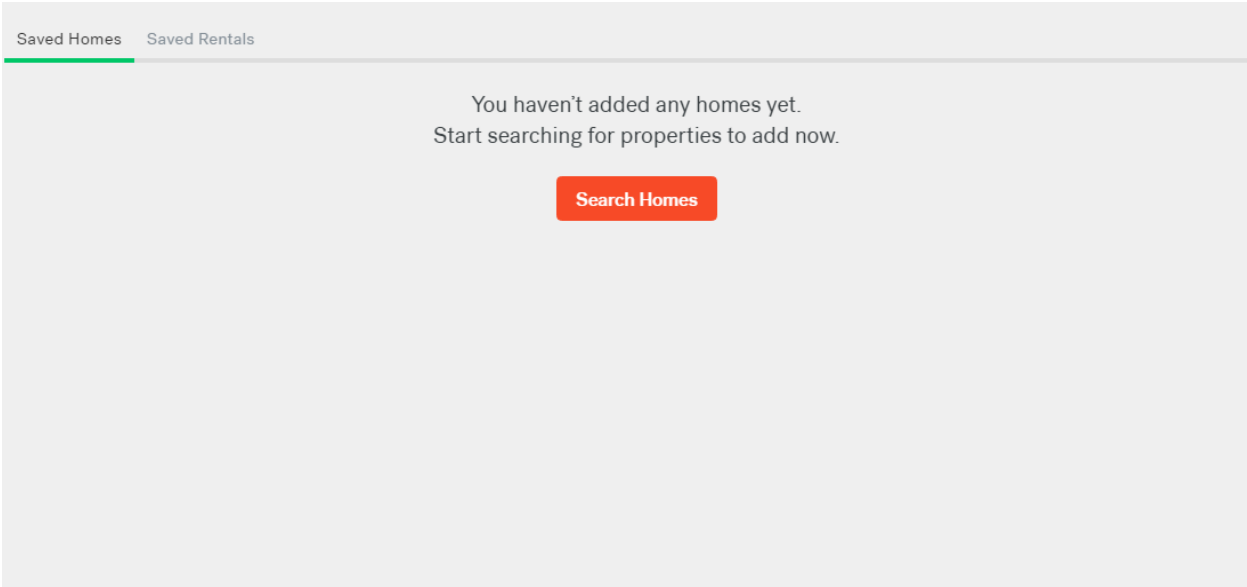
(https://www.trulia.com/NY/New_York/ (for a particular user)).

Second User:



(<https://www.trulia.com/WA/Seattle/> (for a particular user)).


109. For example, a user can also customize their Trulia.com page by selecting their saved Property related deals (Buy/Rent/Mortgage), so that selected Property related deals (Buy/Rent/Mortgage) can be displayed.



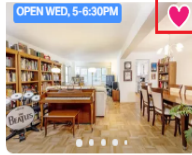
(<https://www.trulia.com/account/properties> (for a particular user)).

First User:

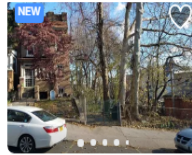
Any Price ▾ All Beds ▾ All Home Types ▾ All For Sale ▾ Keywords ▾ More ▾ **Save Search**



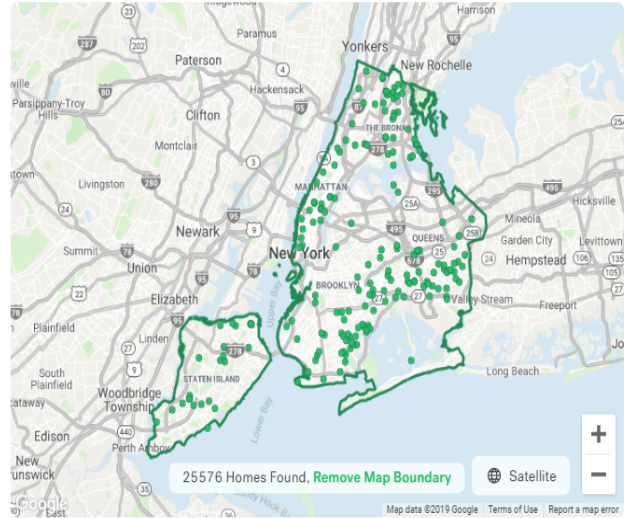
\$180,000
3bd 3ba 1,321 sqft
11630 200th St
St. Albans, Jamaica, NY




\$450,000
2bd 2ba 1,250 sqft
100 W 57th St #8N
Midtown, New York, NY



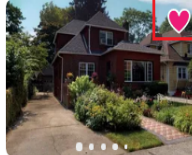
\$295,000
4,645 sqft
21 Barbey St #1
East New York, Brooklyn, NY




25576 Homes Found. [Remove Map Boundary](#) Satellite



\$199,999
3bd 1ba 800 sqft
12 Edgewater Park #12A
Throne Neck, Bronx, NY



\$599,000
3bd 3ba 1,442 sqft
18530 Ilion Ave
Hollis, Jamaica, NY




\$400,000
3bd 1ba 1,186 sqft
1065 Vermont St #8D
East New York, Brooklyn, NY


Selecting saved searches

(https://www.trulia.com/NY/New_York/ (for a particular user)).


Saved Homes Saved Rentals **Display of Saved Searches**



\$400,000
3 bd - 1 ba - 1186 sqft - Condo
1065 Vermont St #8D
Brooklyn, NY, East New York
[View Details](#)



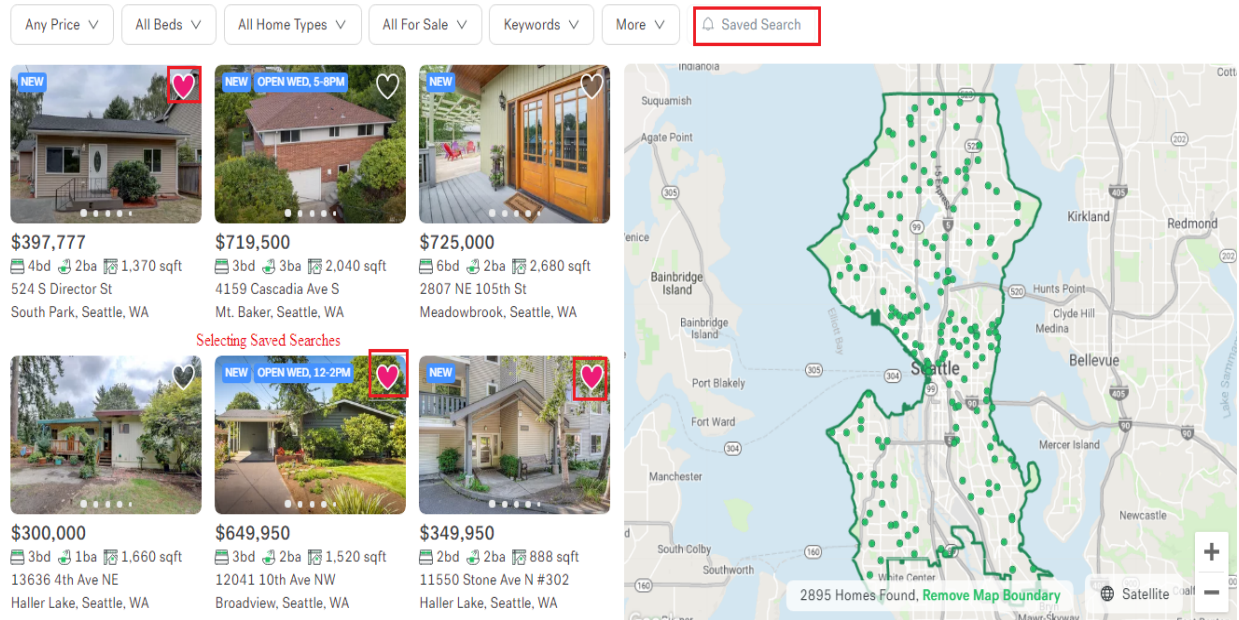
\$599,000
3 bd - 3 ba - 1442 sqft - Single-Family Home
18530 Ilion Ave
Jamaica, NY, Hollis
[View Details](#)



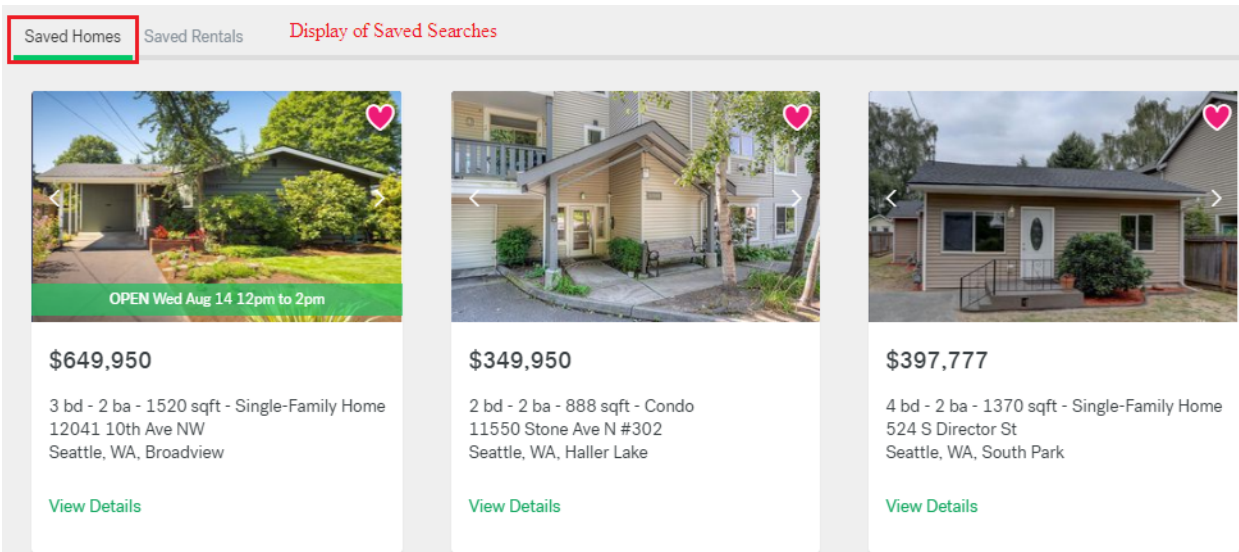
\$450,000
2 bd - 2 ba - 1250 sqft - Coop
100 W 57th St #8N
New York, NY, Midtown
[View Details](#)

(<https://www.trulia.com/account/properties> (for a particular user)).

Second User:



(<https://www.trulia.com/WA/Seattle/> (for a particular user)).



(<https://www.trulia.com/account/properties> (for a particular user)).


110. On information and belief, the Accused Instrumentality performs the step of serving, via the at least one server computer (*e.g.*, Trulia.com server), the user's customized web page (*e.g.*, webpage customized for a user with current property related deals (Buy/Rent/Mortgage), and customized advertisements). (*E.g.*, screenshots in paragraph 109).


111. On information and belief, the Accused Instrumentality performs the step of providing a customized page to the user (e.g., a user's Trulia.com page with integrated advertisements) wherein the user template comprises advertisement selection information for use in selecting one or more advertisements for inclusion in the user's customized web page in addition to real-time information selected for the user's web page (e.g., the code for the webpage will include code that allows for the insertion of target advertisements into a user's customized web page which contains real time information such as current property related deals (Buy/Rent/Mortgage)).

First User:


12 Edgewater Park #12A
Bronx, NY 10465 Throggs Neck

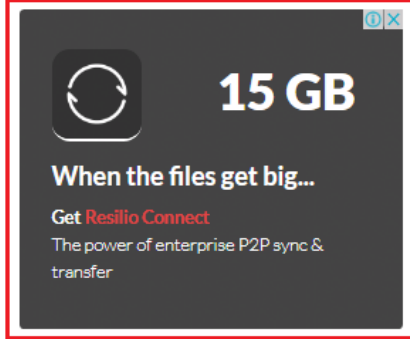
\$199,999

 Save

 Share

Request Info ▾





| What's near 12 Edgewater Park #12A | |
|------------------------------------|------------|
| Starbucks Distance | 1.96 miles |
| Trader Joes Distance | 8.07 miles |
| Whole Foods Distance | 7.45 miles |

| Facts & Figures | |
|-----------------------|--------------|
| Slope of lot | Nearly Level |
| Elevation of property | 16 ft |
| Tree Cover of lot | 11% |

(<https://www.trulia.com/p/ny/bronx/12-edgewater-park-12a-bronx-ny-10465--2408594313> (for a particular user)).

Second User:

13636 4th Ave NE
Seattle, WA 98125
Haller Lake

\$300,000

Save

Share

Request Info

What's near 13636 4th Ave NE

| | |
|----------------------|------------|
| Starbucks Distance | 0.64 miles |
| Trader Joes Distance | 2.01 miles |
| Whole Foods Distance | 3.73 miles |

Facts & Figures

| | |
|-----------------------|-------------|
| Slope of lot | Very Gentle |
| Elevation of property | 331 ft |
| Tree Cover of lot | 25% |

(<https://www.trulia.com/p/wa/seattle/13636-4th-ave-ne-seattle-wa-98125--2118788955> (for a particular user)).

112. Plaintiff has been damaged as a result of Defendant's infringing conduct. Defendant is thus liable to Plaintiff for damages in an amount that adequately compensates Plaintiff for such Defendant's infringement of the '342 patent, *i.e.*, in an amount that by law cannot be less than would constitute a reasonable royalty for the use of the patented technology, together with interest and costs as fixed by this Court under 35 U.S.C. § 284.

113. On information and belief, Defendant has had at least constructive notice of the ‘342 patent by operation of law, and there are no marking requirements that have not been complied with.

VIII. JURY DEMAND

Plaintiff, under Rule 38 of the Federal Rules of Civil Procedure, requests a trial by jury of any issues so triable by right.

IX. PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests that the Court find in its favor and against Defendant, and that the Court grant Plaintiff the following relief:

- a. Judgment that one or more claims of United States Patent No. 8,352,854 have been infringed, either literally and/or under the doctrine of equivalents, by Defendant;
- b. Judgment that one or more claims of United States Patent No. 5,983,227 have been infringed, either literally and/or under the doctrine of equivalents, by Defendant;
- c. Judgment that one or more claims of United States Patent No. 7,171,414 have been infringed, either literally and/or under the doctrine of equivalents, by Defendant;
- d. Judgment that one or more claims of United States Patent No. 7,565,359 have been infringed, either literally and/or under the doctrine of equivalents, by Defendant;
- e. Judgment that one or more claims of United States Patent No. 9,626,342 have been infringed, either literally and/or under the doctrine of equivalents, by Defendant;
- f. Judgment that Defendant account for and pay to Plaintiff all damages to and costs incurred by Plaintiff because of Defendant's infringing activities and other conduct complained of herein, and an accounting of all infringements and damages not presented at trial;
- g. That Plaintiff be granted pre-judgment and post-judgment interest on the damages caused by Defendant's infringing activities and other conduct complained of herein; and
- h. That Plaintiff be granted such other and further relief as the Court may deem just and proper under the circumstances.

August 29, 2019

STAMOULIS & WEINBLATT LLC

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